

Carolyn H. Rosenberg  
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*Special Counsel for Lehman Brothers Holdings, Inc.  
and its affiliated Debtors and Debtors in Possession*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

-----X  
In re : Chapter 11  
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : Case No. 08-13555 (JMP)  
Debtors : (Jointly Administered)  
-----X

**SUMMARY SHEET PURSUANT TO UNITED STATES TRUSTEE  
GUIDELINES FOR REVIEWING APPLICATIONS FOR COMPENSATION  
AND REIMBURSEMENT OF EXPENSES FILED UNDER 11 U.S.C. § 330**

Name of Applicant: Reed Smith LLP

Authorized to Provide  
Professional Services to: The Debtors and Debtors in Possession

Date of Retention: June 1, 2010, *nunc pro tunc*

Period for which compensation and  
reimbursement is sought: December 1, 2010 through February 28, 2011

Amount of Compensation sought as  
actual, reasonable and necessary: \$237,869.50

Amount of Expense Reimbursement sought  
as actual, reasonable and necessary: \$5,517.90

This is a(n): Second Interim Fee Application

The total time expended for preparation of this application is approximately 2.5 hours, and the corresponding compensation is not included herein but will be requested in a future application of Reed Smith LLP for compensation and reimbursement of expenses.

**PRIOR APPLICATIONS**

<b>APPLICANT</b>	<b>APPLICATION FILING DATE AND DOCKET NUMBER</b>	<b>FEES REQUESTED</b>	<b>FEES AWARDED</b>	<b>EXPENSES REQUESTED</b>	<b>EXPENSES AWARDED</b>
Reed Smith LLP	First Interim Application Docket No. 13481	\$418,202.00	\$418,202.00	\$4,832.33	\$4,832.33

**COMPENSATION BY PROFESSIONAL**

<b><u>NAME, DEPARTMENT AND LOCATION</u></b>	<b><u>YEAR OF ADMISSION</u></b>	<b><u>RATE</u></b>	<b><u>HOURS</u></b>	<b><u>AMOUNT</u></b>
<b><u>PARTNERS</u></b>				
Carolyn H. Rosenberg, Litigation – Insurance Recovery, Chicago	1982	\$725.00	127.5	\$92,437.50
Mark S. Hersh, Litigation – Insurance Recovery, Chicago	1983	\$580.00	155.0	\$89,990.00
J. Andrew Moss, Litigation – Insurance Recovery, Chicago	1999	\$500.00	69.9	\$34,950.00
Total Partners:			352.4	\$217,287.50
<b><u>ASSOCIATES</u></b>				
Lana J. Raines, Litigation – Insurance Recovery, Chicago	2002	\$440.00	1.7	\$748.00
Total Associates:			1.7	\$748.00
<b><u>PARAPROFESSIONALS</u></b>				
Jane Ann Conway Gross, Litigation – Insurance Recovery, Chicago	n/a	\$250.00	63.4	\$15,850.00
Elizabeth Anne Arundel, Financial Industry, Chicago	n/a	\$240.00	16.6	\$3,984.00
Total Paraprofessionals:			80.0	\$19,834.00
Blended Hourly Rate				\$547.96
<b>Totals:</b>			<b>434.1</b>	<b>\$237,869.50</b>

**COMPENSATION BY PROJECT CATEGORY**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
1300 Insurance Coverage and Insurance Matters	400.2	\$223,323.00
4600 Firm's Own Billing/Fee Applications	33.9	\$14,546.50
<b>TOTAL</b>	<b>434.1</b>	<b>\$237,869.50</b>

**EXPENSE SUMMARY**

<b>Expense Category</b>	<b>Dec.</b>	<b>Jan.</b>	<b>Feb.</b>	<b>Total</b>
Outside Database, Pacer	\$7.76	\$0.00	\$0.00	\$7.76
Legal Research, Westlaw/Lexis	\$96.25	\$123.86	\$0.00	\$220.11
Lodging Expense	\$2,427.57	\$0.00	\$0.00	\$2,427.57
Internet	\$41.85	\$0.00	\$0.00	\$41.85
Air Travel Expense	\$1,493.60	\$0.00	\$0.00	\$1,493.60
Telephone Expense	\$73.84	\$20.88	\$0.00	\$94.72
Taxi Expense	\$723.78	\$0.00	\$0.00	\$723.78
Meals	\$260.35	\$0.00	\$0.00	\$260.35
Courier Service	\$248.16	\$0.00	\$0.00	\$248.16
<b>Total Disbursements</b>	<b>\$5,373.16</b>	<b>\$144.74</b>	<b>\$0.00</b>	<b>\$5,517.90</b>

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*Special Counsel for Lehman Brothers Holdings, Inc.  
and its affiliated Debtors and Debtors in Possession*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

-----X  
In re : Chapter 11  
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : Case No. 08-13555 (JMP)  
Debtors : (Jointly Administered)  
-----X

**SECOND INTERIM APPLICATION OF REED SMITH LLP,  
SPECIAL COUNSEL TO THE DEBTORS AND DEBTORS IN POSSESSION, FOR  
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD DECEMBER 1, 2010 THROUGH FEBRUARY 28, 2011**

Reed Smith LLP ("Reed Smith") hereby submits its Second Interim Application of Reed Smith LLP, Special Counsel to the Debtors and Debtors in Possession (the "Debtors"), for Allowance of Compensation and Reimbursement of Expenses for the period December 1, 2010 through February 28, 2011 (the "Application") pursuant to 11 U.S.C. §§ 327, 328, 329, 330 and 331, Federal Rule of Bankruptcy Procedure 2016, the Order Pursuant To Sections 105(A) and 331 of the Bankruptcy Code and Bankruptcy Rule 2016(a) Establishing Procedures for Interim Monthly Compensation and Reimbursement of Expenses of Professionals [Docket No. 1388] (the "Compensation Order"), and the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses promulgated by the Executive Office of the United States

Trustees pursuant to 28 U.S.C. § 586(a)(3)(A). By this Application, Reed Smith, as special counsel to the Debtors in these cases, seeks interim approval and payment of compensation for legal services performed and expenses incurred during the period commencing December 1, 2010 through February 28, 2011 (the “Compensation Period”). In support hereof, Reed Smith respectfully represents the following:

**I. FACTUAL BACKGROUND**

1. Commencing on September 15, 2008 and periodically thereafter (as applicable, the “Commencement Date”), Lehman Brothers Holdings Inc. (“LBHI”) and certain of its subsidiaries commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code. The Debtors’ chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Bankruptcy Rule 1015(b). The Debtors are authorized to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On September 17, 2008, the United States Trustee for the Southern District of New York (the “U.S. Trustee”) appointed the statutory committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code (the “Creditors Committee”).

3. On September 19, 2008, a proceeding was commenced under the Securities Investor Protection Act of 1970 (“SIPA”) with respect to Lehman Brothers Inc. (“LBI”). A trustee appointed under SIPA is administering LBI’s estate.

4. On January 19, 2009, the U.S. Trustee appointed Anton R. Valukas as examiner in the above-captioned chapter 11 cases (the “Examiner”) and, by order dated January 20, 2009 [Docket No. 2583], the Court approved the U.S. Trustee’s appointment of the Examiner. The Examiner issued a report of his investigation pursuant to section 1106 of the Bankruptcy Code

on March 11, 2010 [Docket No. 7531]. On July 13, 2010, the Court entered an order discharging the Examiner and his professionals.

5. On May 26, 2009, the Court entered an order appointing a fee committee (the “Fee Committee”) and approving a fee protocol (the “Fee Protocol”) to make recommendations with respect to fees and expenses of retained professionals in these chapter 11 cases [Docket No. 3651].

6. This is the second application Reed Smith for allowance of compensation and for reimbursement of expenses; one prior application has been filed.

#### **EMPLOYMENT OF REED SMITH LLP**

7. On June 22, 2010, the Debtors filed the Application of the Debtors Pursuant to Section 327(e) of the Bankruptcy Code and Rule 2014 of the Federal Rules of Bankruptcy Procedure for Authorization to Employ and Retain Reed Smith LLP, as Special Counsel to the Debtors [Docket No. 9722] (the “Retention Application”).

8. On July 21, 2010, the Court entered an Order Authorizing the Employment and Retention of Reed Smith Order Pursuant To Section 327(e) of the Bankruptcy Code Authorizing the Employment and Retention of Reed Smith LLP, as Special Counsel to The Debtors [Docket No. 10343] (“Retention Order”). A true and correct copy of the Retention Order is attached hereto as **Exhibit A**.

9. On September 21, 2010, the Court approved the Stipulation Amending the Effective Date of the Employment and Retention of Reed Smith LLP as Special Counsel to the Debtors *Nunc Pro Tunc* to June 1, 2010 [Docket No. 11499] (the “Stipulation”). A true and correct copy of the Stipulation is attached hereto as **Exhibit B**.

10. Pursuant to the Retention Order, the Debtors were authorized pursuant to Section 327(e) of the Bankruptcy Code to employ and retain Reed Smith as special counsel to the Debtors on the terms set forth in the Retention Application for the special purpose of insurance recovery matters as identified in the Retention Application and in accordance with Reed Smith's customary rates in effect.

## **II. COMPENSATION AND REIMBURSEMENT OF EXPENSES**

11. Reed Smith submits this Application for the allowance of reasonable compensation for actual and necessary professional services provided to the Debtors in these cases, and for reimbursement of actual and necessary out-of-pocket expenses incurred in representing the Debtors during the Compensation Period. All included services and costs for which Reed Smith seeks compensation were performed for, or on behalf of, the Debtors during the Compensation Period.

12. This Application has been prepared in accordance with the Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases adopted by the Court on April 19, 1995 (the "Local Guidelines"), the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, adopted on January 30, 1996 (the "U.S. Trustee Guidelines"), and the Third Amended Order Pursuant to Sections 105(a) and 331 of the Bankruptcy Code and Bankruptcy Rule 2016(a) Establishing Procedures for Interim Monthly Compensation and Reimbursement of Expenses of Professionals [Docket No. 4165] (the "Administrative Order," and together with the Local Guidelines and the U.S. Trustee Guidelines, the "Guidelines"). Reed Smith seeks to comply with the directions provided by the Fee Committee and will provide a copy of this Application to the Fee Committee.

13. In connection with services performed, Reed Smith billed a total of \$237,869.50 in fees and incurred \$5,517.90 in expenses on behalf of the Debtors during the Compensation Period.

14. By this Application, Reed Smith seeks: (a) interim allowance of compensation in the amount of \$237,869.50 for legal services rendered during the Compensation Period, and reimbursement in the amount of \$5,517.90 for expenses incurred during the Compensation Period.

15. For the Court's review, a summary containing the names of each Reed Smith professional and paraprofessional rendering services to the Debtors during the Compensation Period, their customary billing rates, the time expended by each professional and paraprofessional, and the total value of time incurred by each professional and paraprofessional is attached as **Exhibit C**.

16. In addition, **Exhibit C** contains detailed time entries reflecting the time recorded for services rendered on a daily basis during the Compensation Period and descriptions of the services provided, identified by project task categories.

17. **Exhibit C** also contains a breakdown of expenses incurred and disbursed by Reed Smith during the Compensation Period. Reed Smith has incurred out-of-pocket expenses during the Compensation Period in the amount of \$5,517.90. This sum is broken down into categories of charges, including, among other things, telephone charges, travel and lodging charges, postage and photocopying charges and legal research charges. Reed Smith's rate for in-house duplication is \$0.10 per page. Reed Smith also uses outside duplication services for large photocopy work.



**III. ANALYSIS AND NARRATIVE DESCRIPTION  
SERVICES RENDERED AND TIME EXPENDED**

18. Section 330(a) of the Bankruptcy Code provides, in pertinent part, that bankruptcy courts may award “reasonable compensation for actual, necessary services rendered by the trustee, examiner, ombudsman, professional person, or attorney and by any paraprofessional employed by any such person.” *See* 11 U.S.C. § 330(a)(1)(A). The attorneys requesting compensation from the bankruptcy estate bear the burden of demonstrating to the Court that the services performed and fees incurred were reasonable.

19. In determining the amount of reasonable compensation to be awarded, the Court shall consider, pursuant to Section 330(a)(3) of the Bankruptcy Code, the nature, extent, and the value of such services, taking into account all relevant factors, including: (A) the time spent on such services; (B) the rates charged for such services; (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title; (D) whether the services were performed within a reasonable time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy filed; and (F) whether the compensation is reasonable, based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title. *See* 11 U.S.C. § 330(a)(3)(A)-(F).

20. With respect to the time and labor expended by Reed Smith in these cases, as set forth in **Exhibit C**, during the Compensation Period, Reed Smith rendered professional services in the aggregate amount of \$237,869.50. Reed Smith believes it is appropriate for it to be

compensated for the time spent in connection with these matters, and sets forth a brief narrative description of the services rendered, for or on behalf of the Debtors, and the time expended, organized by project task categories, as follows:

**A. SPECIAL INSURANCE COVERAGE**

21. During the Compensation Period, Reed Smith's services performed in connection with this category relate to, *inter alia*: (1) evaluation and analysis of D&O insurance coverage, particularly with regard to insurance that may be available to respond to pending and future claims against directors and officers; (2) advising and counseling the Debtors regarding potential insurance recovery under D&O insurance policies issued to the Debtors in connection with claims made against directors and officers; (3) preparation of correspondence and substantive documents as necessary with regard to potential D&O insurance recovery for claims made against the directors and officers; (4) appearing and representing the interests of the Debtors with respect to D&O insurance recovery issues at meetings between the Debtors, representatives of the directors and officers and representatives of the D&O insurers; and (5) appearing and representing the interests of the Debtors with respect to D&O insurance recovery issues at alternative dispute resolution proceedings between claimants and the directors and officers. Reed Smith seeks compensation for 434.1 hours of reasonable and necessary legal services performed for Special Insurance Coverage matters during the Compensation Period in the total amount of \$223,323.00.

22. During the compensation period, the following Reed Smith professionals and paraprofessionals performed services under this category: Jane Ann Conway Gross, Mark S. Hersh, J. Andrew Moss, Lana J. Raines, and Carolyn H. Rosenberg.

23. Reed Smith believes that its rates are market rates within the range charged by other counsel in this marketplace for similar Chapter 11 cases. The billing rates set forth in Reed Smith's Summary Sheet pursuant to U.S. Trustee Guidelines (the "Summary") represent customary rates routinely billed to the firm's many clients. (*See* Exhibit A). Moreover, the Retention Application and the accompanying Declarations in Support of the Retention Application stated that Reed Smith would be compensated on an hourly basis, plus reimbursement of actual, reasonable and necessary out-of-pocket expenses incurred by the firm. Here, the compensation requested does not exceed the reasonable value of the services rendered. Reed Smith's standard hourly rates for work of this nature are set at a level designed to fairly compensate Reed Smith for the work of its attorneys and paraprofessionals and to cover fixed and routine overhead expenses.

24. Further, the Debtors sought to retain Reed Smith as special counsel due to its extensive experience and knowledge in the field of D&O insurance recovery matters on behalf of policyholders in the financial services industry, and because of its expertise, experience and knowledge practicing in matters that are likely to arise in these cases before this Court.

**B. FIRM'S OWN BILLING/FEE APPLICATIONS**

25. In connection with the work performed on behalf of the Debtors, Reed Smith prepared and submitted its Fourth monthly statement, Fifth monthly statement, and First Interim Fee Application seeking interim allowance of compensation and reimbursement of expenses. Reed Smith seeks compensation for 33.9 hours of reasonable and necessary legal services performed during the Compensation Period in connection with fee statements and fee applications in the total amount of \$14,546.50.

26. During the compensation period, the following Reed Smith professionals and paraprofessionals performed services under this category: Elizabeth Anne Arundel, J. Andrew Moss, and Carolyn H. Rosenberg.

27. As shown in the Summary, this Application covers the period from December 1, 2010 through February 28, 2011. Every effort was made to include all fees and expenses from the Compensation Period in this Application. Some fees and/or expenses from the Compensation Period might not be included in this Application due to delays in processing time and receipt of invoices for expenses and/or for preparation of the instant application subsequent to the Compensation Period. Accordingly, Reed Smith reserves the right to make further applications to the Court for allowance of fees and expenses not included herein.

28. Reed Smith believes that the Application and the description of services set forth herein for work performed are in compliance with the requirements of the Local Guidelines, the U.S. Trustee Guidelines, and the Administrative Order, and the applicable guidelines and requirements of the Bankruptcy Code and the Federal Rules of Bankruptcy Procedure. A true and correct copy of the Certification of Carolyn H. Rosenberg is attached hereto as **Exhibit D**.

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WHEREFORE, Reed Smith respectfully requests monthly interim allowance of compensation for professional services rendered in the amount of \$237,869.50 and reimbursement of expenses in the amount of \$5,517.90 for the period December 1, 2010 through February 28, 2011 and payment according to the procedures set forth in the Compensation Order.

Dated: June 2, 2011  
Chicago, Illinois

Respectfully submitted,

REED SMITH LLP

By: /s/ Carolyn H. Rosenberg  
Carolyn H. Rosenberg  
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Suite 4000  
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Telephone: (312) 207-1000  
Facsimile: (312) 207-6400

*Special Counsel for Lehman Brothers  
Holdings, Inc. and its affiliated Debtors  
and Debtors in Possession*

## **EXHIBIT A**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
	:
<b>In re</b>	:
	:
<b>LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i>,</b>	:
	:
<b>Debtors.</b>	:
	:
-----X	

**Chapter 11 Case No.**  
**08-13555 (JMP)**  
**(Jointly Administered)**

**ORDER PURSUANT TO SECTION 327(e)  
OF THE BANKRUPTCY CODE AUTHORIZING  
THE EMPLOYMENT AND RETENTION OF REED  
SMITH LLP, AS SPECIAL COUNSEL TO THE DEBTORS**

Upon consideration of the application, dated June 22, 2010 (the “Application”),<sup>1</sup> of Lehman Brothers Holdings Inc. (“LBHI”) and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors-in-possession (collectively, the “Debtors”), pursuant to section 327(e) of chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2014(a) of the Federal Rules of Bankruptcy Procedures (the “Bankruptcy Rules”), and Rule 2014-1 of the Local Bankruptcy Rules for the Southern District of New York (the “Local Rules”), to employ and retain Reed Smith LLP (“Reed Smith”) as special counsel to the Debtors, all as more fully described in the Application; and upon the Declaration of Carolyn H. Rosenberg (the “Rosenberg Declaration”), filed in support of the Application; and the Court being satisfied, based on the representations made in the Application and the Rosenberg Declaration, that Reed Smith represents no interest adverse to the Debtors or the Debtors’ estates with respect to the matters upon which it is to be engaged, under section 327 of the Bankruptcy Code; and the Court having jurisdiction to consider the Application and the relief requested therein in accordance

<sup>1</sup> Capitalized terms that are used but not defined in this order have the meanings ascribed to them in the Application.

with 28 U.S.C. §§ 157 and 1334 and the Standing Order M-61 Referring to Bankruptcy Judges for the Southern District of New York Any and All Proceedings Under Title 11, dated July 10, 1984 (Ward, Acting C.J.); and consideration of the Application and the relief requested therein being a core proceeding pursuant to 28 U.S.C. §157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Application having been provided in accordance with the procedures set forth in the amended order entered February 13, 2009 governing case management and administrative procedures [Docket No. 2837] to (i) the United States Trustee for the Southern District of New York; (ii) the attorneys for the Official Committee of Unsecured Creditors; (iii) the Securities and Exchange Commission; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern District of New York; and (vi) Reed Smith, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Application is in the best interests of the Debtors, their estates and creditors, and all parties in interest and that the legal and factual bases set forth in the Application establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED that the Application is approved; and it is further

ORDERED that pursuant to section 327(e) of the Bankruptcy Code, the Debtors are hereby authorized to employ and retain Reed Smith as special counsel to the Debtors on the terms set forth in the Application and this order for the specified special purpose of insurance recovery matters identified in the Application and in accordance with Reed Smith's customary rates in effect from time to time and its disbursement policies; and it is further

ORDERED that Reed Smith shall apply for compensation and reimbursement of expenses in accordance with the procedures set forth in sections 330 and 331 of the Bankruptcy



Code, applicable Bankruptcy Rules, the Local Rules and orders of the Court, guidelines established by the U.S. Trustee, and such other procedures that have been or may be fixed by order of this Court, including but not limited to the Court's Third Amended Order Pursuant to Sections 105(a) and 331 of the Bankruptcy Code and Bankruptcy Rule 2016(a) Establishing Procedures for Interim Monthly Compensation and Reimbursement of Expenses of Professionals [Docket No. 4165] and the Court's Order Appointing a Fee Committee and Approving a Fee Protocol [Docket No. 3651].

Dated: New York, New York  
July 21, 2010

*s/ James M. Peck*  
Honorable James M. Peck  
United States Bankruptcy Judge

## **EXHIBIT B**

A. On June 22, 2010, the Debtors filed their Application of the Debtors Pursuant to Section 327(e) of the Bankruptcy Code and Rule 2014 of the Federal Rules of Bankruptcy Procedure for Authorization to Employ and Retain Reed Smith LLP, as Special

Counsel to the Debtors (the “Application”) and the Declaration of Carolyn H. Rosenberg on Behalf of Reed Smith LLP in Support of Debtors’ Application for Authorization to Employ and Retain Reed Smith LLP, as Special Counsel to the Debtors. [Docket No. 9722]. The Debtors requested authorization to engage Reed Smith LLP as special counsel with respect to directors’ and officers’ liability insurance coverage.

B. On July 21, 2010, this Court approved the Application by way of its Order Pursuant to Section 327(e) of the Bankruptcy Code Authorizing the Employment and Retention of Reed Smith LLP, as Special Counsel to the Debtors (the “Retention Order”). [Docket No. 10343]. The Retention Order states that “the Debtors are hereby authorized to employ and retain Reed Smith LLP as special counsel to the Debtors on the terms set forth in the Application. . . .” Retention Order, at 2.

C. The Debtors and Reed Smith, did not request *nunc pro tunc* approval in the abundance of caution, therefore Reed Smith’s employment and retention as special counsel was effective upon entry of the Retention Order.

D. To ensure Reed Smith is compensated for all of its services rendered to the Debtors, the Parties request Reed Smith’s retention be made effective *nunc pro tunc* to June 1, 2010. The Debtors submit that the significant work Reed Smith performed at their request, prior to entry of the Retention Order, was necessary and provided value to the Debtors and their respective estates, thereby warranting retroactive approval.

#### **AGREEMENT**

E. Reed Smith’s retention as special counsel to the Debtors shall be effective *nunc pro tunc* to June 1, 2010.

F. In all other respects the terms of the Retention Order shall remain in full force and effect.

G. This Stipulation is subject to approval of the Court and shall be of no force and effect unless and until it is approved.

*[Signature Page Follow]*

Dated: August 16, 2010  
New York, New York

Dated: August 16, 2010

By: /s/ Richard P. Krasnow

By: /s/ Carolyn Rosenberg

Richard P. Krasnow  
WEIL, GOTSHAL & MANGES LLP  
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*Attorneys for Lehman Brothers Holdings,  
Inc. and its Affiliated Debtors and Debtors-  
in-Possession*

*Special Counsel for Lehman Brothers  
Holdings, Inc. and its Affiliated Debtors  
and Debtors-in-Possession*

NO OBJECTION

Tracy Hope Davis  
Acting United States Trustee

By: /s/ Andrew D. Velez-Rivera  
OFFICE OF THE U.S. TRUSTEE  
33 Whitehall Street, Suite 2100  
New York, New York 10004  
Telephone: (212) 510-0500  
Facsimile: (212) 668-2255

*Trial Attorney*

**SO ORDERED:**

Dated: New York, New York  
September 21, 2010

s/ James M. Peck  
HONORABLE JAMES M. PECK  
UNITED STATES BANKRUPTCY JUDGE

## **EXHIBIT C**

**ReedSmith**

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NEW YORK ♦ LONDON ♦ HONG KONG ♦ CHICAGO ♦ WASHINGTON, D.C ♦ BEIJING ♦ PARIS ♦ LOS ANGELES ♦ SAN FRANCISCO ♦ PHILADELPHIA ♦ PITTSBURGH ♦  
OAKLAND ♦ MUNICH ♦ ABU DHABI ♦ PRINCETON ♦ NORTHERN VIRGINIA ♦ WILMINGTON ♦ SILICON VALLEY ♦ DUBAI ♦ CENTURY CITY ♦ RICHMOND ♦ GREECE

Lehman Brothers Holdings Inc.  
1271 Avenue of the Americas, 38th Floor  
New York, NY 10020

Invoice Number: **2087051**  
Invoice Date: **1/28/2011**  
Client Number: **330015**  
Matter Number: **00001**

**RE: Chapter 11 Special Insurance Coverage Counsel 12/1/2010 – 12/31/2010**

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**INVOICE SUMMARY**

Total Current Fees .....	\$ 80,015.00
Total Current Disbursements .....	<u>5,373.16</u>
<b>Total Due This Invoice:</b>	<b>\$ <u>\$85,388.16</u></b>

Please Remit to:

**Mail To:**  
Reed Smith LLP  
2672 Paysphere Circle  
Chicago, IL 60674

**Wire Instructions:**  
Bank of America, N.A.  
Chicago, IL  
ABA Number: 0260-0959-3  
Swift Code: BOFAUS3N (International)  
Account #5201742490  
**(Please Reference Invoice Number)**





10 South Wacker Drive, 40<sup>th</sup> Floor  
Chicago, IL 60606-7507  
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Tax ID # 25-0749630

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OAKLAND ♦ MUNICH ♦ ABU DHABI ♦ PRINCETON ♦ NORTHERN VIRGINIA ♦ WILMINGTON ♦ SILICON VALLEY ♦ DUBAI ♦ CENTURY CITY ♦ RICHMOND ♦ GREECE

Lehman Brothers Holdings Inc.  
1271 Avenue of the Americas, 38th Floor  
New York, NY 10020

Invoice Number: **2087051**  
Invoice Date: **1/28/2011**  
Client Number: **330015**  
Matter Number: **00001**

**RE: Chapter 11 Special Insurance Coverage Counsel**

**DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH December 31, 2010**

Date	Timekeeper	Description	Task	Hours	Amount
11/29/10	M.S. Hersh	Worked on letter to XL regarding key coverage issue (4.3); reviewed emails regarding mediation preparation (.3); exchanged emails with colleagues regarding mediation preparation (.2); responded to carrier inquiries (.1).	1300	4.90	2,842.00
11/30/10	M.S. Hersh	Finalized letter to XL regarding key "relatedness" coverage issues, including incorporating edits from defense counsel (4.1); telephone conference with carriers regarding mediation preparation (.5); prepared for mediation (.7); drafted emails to carrier (.2); drafted emails to mediator (.2).	1300	5.70	3,306.00
12/01/10	M.S. Hersh	Reviewed recent correspondence and emails (.3); emails to and from carriers (.2); prepared for mediation (.8); reviewed various complaints (.2).	1300	1.50	870.00
12/01/10	C.H. Rosenberg	Reviewed letter forwarded by D. Brew on Lehman Brothers Finance AG claim (.10); communication with M. Solinger on the correspondence (.10); reviewed seven letters forwarded by Marsh from CNA regarding	1300	2.00	1,450.00



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Date	Timekeeper	Description	Task	Hours	Amount
		investigations (.30); communication with A. Moss and paralegal, J. Gross, regarding the correspondence (.10); prepared for 12/2/10 meeting with defense counsel (.50); reviewed communication to J. Melnick and Judge Weinstein on requested correspondence (.10); reviewed communication to carriers on additional mediation submission (.10); reviewed Stichting plaintiff's mediation submission and communication from Simpson defense counsel (.30); communication with carriers on additional mediation submission (.10); reviewed communication from defense counsel regarding mediation (.10); reviewed reply of M. Hersh and addressed strategy (.10); reviewed M. Hersh's communication on mediation strategy (.10).			
12/01/10	A.J. Moss	Reviewed email from D. Brew (Marsh) regarding carrier correspondence (.1); reviewed recent coverage letters from various D&O carriers received from Marsh (.2); reviewed policies and mediation submissions in preparation for mediation (.5); communications with C. Rosenberg regarding same (.1); communications with defense counsel regarding mediation submission of Stichting MBS plaintiffs (.1); reviewed same (.3); communications with carrier representatives regarding same (.2); communications with R. Lusk regarding coverage	1300	2.00	1,000.00

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Date	Timekeeper	Description	Task	Hours	Amount
		correspondence (.1); worked on responses to carriers regarding mediation (.4).			
12/01/10	J.A.C. Gross	Organized coverage correspondence Pdfs and sent separate emails to Judge Weinstein and J. Melnick with each pdf (1.20); organized carrier email distribution lists (.6).	1300	1.80	450.00
12/02/10	M.S. Hersh	Prepared for mediation (including while traveling) (2.60); traveled to New York for mediation (1.70=50% time); meeting at Simpson offices regarding mediation preparation (1.20)	1300	5.50	3,190.00
12/02/10	C.H. Rosenberg	Reviewed communication from R. Lusk and replied to same (.10); traveled to New York for mediation and prepared en route (2.00 = 50% time); communication with M. Hersh on mediation strategy options (.30); reviewed J. Melnick's communication relating to mediation (.10); communication with J. Coviello regarding mediation correspondence (.10); communication with M. Hersh on correspondence to provide in response to J. Melnick's request (.10); reviewed tender letter from M. Armstrong on Fuller (.10); reviewed Chubb acknowledgement regarding Fuller (.10); met with E. Albert and Simpson defense counsel on mediation preparation (1.00); follow-up communication with A. Moss on additional correspondence to provide to parties (.10); outlined issues and	1300	5.40	3,915.00



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Date	Timekeeper	Description	Task	Hours	Amount
		options for mediation (1.00); further communication with M. Hersh on potential mediation issues (.30); reviewed communication with A. Moss on correspondence (.10).			
12/02/10	A.J. Moss	Telephone call with JAMS representatives (.1); telephone call to E. McGarry (.1); reviewed email from mediator and from J. Coviello regarding same (.1); communications with defense counsel, C. Rosenberg and M. Hersh (.3); reviewed and finalized production to investor class plaintiffs' counsel (.5); communications with M. Berger (.1); communications with M. Hersh (.1); communications with J. Laitman (.2); communications with M. Solinger and mediator (.1); further communications with M. Hersh regarding mediation (.2).	1300	1.80	900.00
12/02/10	J.A.C. Gross	Continued organization of carrier correspondence, mediation materials and distribution lists (3.5).	1300	3.50	875.00
12/03/10	M.S. Hersh	Worked enroute while traveling back to Chicago (2.50 = 50% time).	1300	2.50	1,450.00
12/03/10	M.S. Hersh	Attended mediation of debt-equity and SASCo actions (including preparation session).	1300	6.00	3,480.00
12/03/10	C.H. Rosenberg	Preparatory meeting with M. Solinger, D. Brew and Simpson defense counsel (.80); participated in mediation with Judge Weinstein (4.50); return travel to Chicago and work in	1300	8.70	6,307.50



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		flight (2.00 = 50% time); reviewed communication from J. Melnick on mediation submissions (.10); reviewed communication from E. McGarry on statements (.10); reviewed communication with A. Moss on requested exchanges of documents (.10); reviewed follow-up communication from J. Melnick (.10); communication with M. Hersh on mediation (.10); reviewed D&O Lehman Bros. Finance AG correspondence from M. Armstrong (.10); reviewed Wartmann & Merker letter from M. Armstrong (.10); reviewed Latvia matter under Lehman Holdings (Venture Capital) from M. Armstrong (.10); reviewed inquiry from M. Armstrong on Fund program(.10); reviewed Lehman D&O correspondence from M. Armstrong (.20); reviewed communication from J. Coviello to J. Melnick (.10); reviewed communication from A. Moss to J. Melnick (.10); reviewed Chartis's 12/3/10 letter (.10).			
12/03/10	A.J. Moss	Communications with M. Hersh regarding status of mediation (.2); communications with E. Kirk and A. Calkins (ACE Global) (.2); communications with S. Schreiber (JAMS) (.1); communications with J. Melnick (JAMS) (.2); communications with E. McGarry (.1).	1300	0.80	400.00
12/03/10	A.J. Moss	Worked on monthly fee statement.	4600	0.50	250.00
12/03/10	J.A.C. Gross	Organized Marsh claim files (1.0);	1300	2.20	550.00



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Date	Timekeeper	Description	Task	Hours	Amount
		organized email correspondence (1.2).			
12/04/10	C.H. Rosenberg	Reviewed communication with J. Melnick.	1300	0.10	72.50
12/04/10	C.H. Rosenberg	Reviewed November invoice for fee submission and revised same.	4600	0.50	362.50
12/04/10	A.J. Moss	Communications with E. McGarry regarding mediation (.1); communications with C. Rosenberg regarding mediation (.1); communications with MDL plaintiffs' counsel regarding mediation (.1).	1300	0.30	150.00
12/05/10	M.S. Hersh	Traveled to New York City for mediation and prepared for mediation (2.40=50% time).	1300	2.40	1,392.00
12/05/10	C.H. Rosenberg	Traveled to New York for second day of mediation and prepared en route (3.00 = 50% time).	1300	3.00	2,175.00
12/06/10	M.S. Hersh	Attended mediation of underlying debt-equity and SASCo actions.	1300	9.50	5,510.00
12/06/10	C.H. Rosenberg	Prepared for mediation (.30); participated in all day mediation of underlying debt-equity and SASCo cases and coverage issues (7.50); worked en route of return travel to Chicago reviewing claim correspondence from Marsh and carriers (2.00=50% time); communication with M. Hersh on mediation developments and strategy (.30); communication with A. Moss on mediation coverage options and research (.20).	1300	10.30	7,467.50
12/06/10	A.J. Moss	Telephone call with M. Hersh regarding mediation-related	1300	1.40	700.00



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Date	Timekeeper	Description	Task	Hours	Amount
		distributions (.1); reviewed correspondence to mediation parties (.1); further communications with mediators and M. Hersh regarding same (.1); reviewed correspondence from various carriers received from broker (.3); communications with C. Rosenberg regarding same (.1); reviewed and responded to substantive email from C. Rosenberg regarding research (.1); researched NY law on various insurance recovery topics (.2); communications with C. Rosenberg regarding mediation status and issues (.3); reviewed substantive email from M. Hersh regarding same (.1)			
12/07/10	M.S. Hersh	Attended mediation of underlying debt-equity and SASCo actions.	1300	5.50	3,190.00
12/07/10	M.S. Hersh	Telephone conference with C. Rosenberg and D Brew regarding mediation.	1300	0.40	232.00
12/07/10	M.S. Hersh	Worked while traveling back to Chicago (2.00=50% time).	1300	2.00	1,160.00
12/07/10	C.H. Rosenberg	Reviewed G. Dixon and K. Melvin's communication on correspondence (.10); communication with M. Hersh on mediation status (.10); reviewed communication with A. Moss on requested correspondence (.10); reviewed communication from M. Solinger (.10); telephone conference with M. Hersh on developments at mediation (.20); reviewed communication with D. Brew (Marsh) on mediation (.10); reviewed communication from A.	1300	0.80	580.00



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Date	Timekeeper	Description	Task	Hours	Amount
		Moss (.10).			
12/07/10	C.H. Rosenberg	Communication with A. Moss on interim fee submission.	4600	0.20	145.00
12/07/10	A.J. Moss	Communications with M. Hersh regarding mediation production materials (.2); communications with mediator, H. Ta, M. Hersh and carrier representatives regarding mediation production (.2); reviewed email from D. Brew (Marsh) (.1); reviewed email from M. Solinger and defense counsel regarding mediation (.1); communications with M. Hersh regarding same (.1); communications with J.A.C. Gross regarding recently received coverage correspondence (.1).	1300	0.80	400.00
12/07/10	A.J. Moss	Communications with C. Rosenberg regarding interim application for reimbursement (.1); communications with C. Arthur regarding same (.1).	4600	0.20	100.00
12/07/10	J.A.C. Gross	Reviewed current emails transmitting additional claims and correspondence (.50).	1300	0.50	125.00
12/08/10	M.S. Hersh	Reviewed recent emails and correspondence.	1300	0.70	406.00
12/08/10	M.S. Hersh	Exchanged emails with client and colleagues regarding plaintiff inquiry.	1300	0.30	174.00
12/08/10	C.H. Rosenberg	Reviewed November invoice for third interim fee application (.30); reviewed A. Arundel's communication on interim fee application (.10).	4600	0.40	290.00
12/08/10	C.H. Rosenberg	Reviewed M. Armstrong's communication and	1300	0.80	580.00





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Date	Timekeeper	Description	Task	Hours	Amount
		correspondence on V-Cap policies (.10); reviewed additional V-Cap claim correspondence from Marsh (.10); reviewed letters on Fuld, tolling agreements, subprime and MLP-related coverage from carriers (.30); communication with M. Hersh on mediation issues (.10); reviewed communication from M. Chepiga on mediation (.10); communication with M. Solinger on mediation (.10).			
12/08/10	A.J. Moss	Communications with C. Rosenberg regarding mediation (.1); communications with M. Hersh (.1); reviewed email from mediation party (.1); communications with C. Rosenberg and M. Hersh regarding same (.1); reviewed recently received coverage correspondence from Chartis (.1).	1300	0.50	250.00
12/08/10	A.J. Moss	Communications with C. Rosenberg regarding interim application and monthly statement (.1); reviewed email from A. Arundel regarding same (.1).	4600	0.20	100.00
12/09/10	M.S. Hersh	Review recent emails and correspondence.	1300	0.30	174.00
12/09/10	M.S. Hersh	Exchanged emails with client, defense counsel and carrier	1300	0.30	174.00
12/09/10	M.S. Hersh	Analyzed strategy regarding mediation.	1300	0.40	232.00
12/09/10	M.S. Hersh	Met with colleagues regarding mediation report, strategy.	1300	0.50	290.00
12/09/10	M.S. Hersh	Prepared for meeting with	1300	0.20	116.00



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Date	Timekeeper	Description	Task	Hours	Amount
		colleagues.			
12/09/10	C.H. Rosenberg	Reviewed draft of third monthly fee submission.	4600	0.20	145.00
12/09/10	C.H. Rosenberg	Communication with M. Solinger on mediation issues (.10); reviewed M. Hersh's communication regarding mediation (.10); reviewed MLP letter forwarded by M. Armstrong (.10); reviewed communication from K. Melvin on mediation (.10); communication with M. Hersh on K. Melvin's inquiry (.10); reviewed communication from E. Albert (.10); further communication with K. Melvin (.10); meeting with M. Hersh to address further mediation follow up and developments (.50); reviewed additional coverage correspondence from M. Armstrong (.30); communication with M. Hersh on mediation issues (.20).	1300	1.70	1,232.50
12/09/10	A.J. Moss	Communications with M. Hersh regarding mediation (.1); worked on follow-up mediation issue (.2); meeting with C. Rosenberg and M. Hersh to discuss mediation and strategic planning issues (.5).	1300	0.80	400.00
12/09/10	A.J. Moss	Communications with C. Rosenberg and A. Arundel regarding Monthly Statement and Interim Application (.1); reviewed and edited Monthly Statement (.9); communications with C. Rosenberg and A. Arundel regarding same (.1).	4600	1.10	550.00
12/09/10	E.A. Arundel	Prepare Reed Smith Third Monthly Fee Statement and First	4600	4.30	1,032.00



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Date	Timekeeper	Description	Task	Hours	Amount
		Interim Fee Application (4.3)			
12/10/10	M.S. Hersh	Prepared for meeting to discuss coverage and strategic issues.	1300	0.20	116.00
12/10/10	M.S. Hersh	Email to client regarding mediation issue.	1300	0.10	58.00
12/10/10	M.S. Hersh	Reviewed recent emails regarding mediation issues.	1300	0.30	174.00
12/10/10	M.S. Hersh	Reviewed recent carrier correspondence.	1300	0.30	174.00
12/10/10	M.S. Hersh	Met with C. Rosenberg regarding mediation issue.	1300	0.30	174.00
12/10/10	C.H. Rosenberg	Reviewed draft interim application for compensation.	4600	0.50	362.50
12/10/10	C.H. Rosenberg	Reviewed Wiley Rein's 10/28/10 letter regarding Essex Equity (.10); telephone conference with M. Hersh and mediation parties regarding mediation (.30); communication with M. Solinger on mediation issues (.20); reviewed and finalized third monthly fee petition (.30); reviewed M. Solinger's communication to K. Melvin regarding Auction Rates cases (.10); reviewed A. Washington's letter on SASCo (.10); reviewed Glickenhau's tender letter from M. Armstrong (.10); reviewed additional coverage correspondence from M. Armstrong (.20); reviewed J. Coviello's communication to Judge Weinstein (.20); reviewed and responded to J. Coviello's email on mediation request (.10).	1300	1.70	1,232.50
12/10/10	A.J. Moss	Reviewed recently received coverage correspondence (.1);	1300	2.00	1,000.00



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		reviewed email from J. Coviello regarding mediation (.1).			
12/10/10	A.J. Moss	Communications with C. Rosenberg and A. Arundel regarding Interim Application (.1); reviewed and revised same (.4).	4600	0.50	250.00
12/10/10	J.A.C. Gross	Organized carrier correspondence and emails.	1300	0.50	125.00
12/10/10	E.A. Arundel	Prepare third fee statement and first interim fee application and circulate for review.	4600	4.30	1,032.00
12/11/10	C.H. Rosenberg	Further communication on interim fee petition.	4600	0.20	145.00
12/12/10	C.H. Rosenberg	Communication with M. Hersh on materials for carriers.	1300	0.10	72.50
12/13/10	C.H. Rosenberg	Reviewed communication from A. Moss to insurers (.10); reviewed Glickenhau correspondence from M. Armstrong (.10); reviewed communication to Venture Capital carriers (.10); reviewed communication from Gidumal matter (.10); reviewed Chubb's letter on Glickenhau (.10); reviewed additional carrier letters on Glickenhau (.10); reviewed further correspondence from M. Armstrong on V-Cap policies (.10); reviewed translated correspondence from M. Armstrong (.10); reviewed request from carrier for information (.10); communication with M. Hersh and A. Moss (.10); communication with D. Brew (.10); reviewed syndicates list inquiry and information (.10); communication with J. Gross on Lloyd's (.10).	1300	1.30	942.50



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12/13/10	A.J. Moss	Reviewed substantive comments from C. Rosenberg on interim application (.2); worked on revisions and further comments to same (1.1); communications with C. Rosenberg and A. Arundel regarding same (.1).	4600	1.40	700.00
12/13/10	A.J. Moss	Communications with M. Hersh (.1); reviewed email from J. Coviello regarding mediation materials (.1); communications with D&O carrier representatives regarding same (.2); communications with M. Solinger (.1).	1300	0.50	250.00
12/13/10	J.A.C. Gross	Reviewed and organized correspondence from carriers and new claims submitted by Marsh (4.9); conferred with A. Moss regarding venture capital and investment management programs (.10).	1300	5.00	1,250.00
12/14/10	M.S. Hersh	Reviewed recent emails regarding carrier inquiry and "stand-down" issue.	1300	0.30	174.00
12/14/10	M.S. Hersh	Exchanged emails with defense counsel regarding "Stand-down" issue.	1300	0.20	116.00
12/14/10	C.H. Rosenberg	Reviewed letter from Marsh London on Glickenhau (.10); reviewed communication on Bolton claim (.10); communication with M. Solinger on Bolton status (.10); communication with Marsh on Bolton status (.10); reviewed E. McGarry's update on status of debt equity cases and discovery (.10); reviewed communication	1300	1.40	1,015.00



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Date	Timekeeper	Description	Task	Hours	Amount
		with M. Solinger and Simpson counsel on developments (.30); reviewed communication from M. Armstrong on Fuld matter (.10); reviewed communication from J. Melnick (.10); further communication with M. Hersh on carrier communications (.10); reviewed additional status update from mediator (.10); communication with E. McGarry and M. Hersh on developments and carrier communications (.10); communication with A. Moss on developments (.10).			
12/14/10	C.H. Rosenberg	Reviewed interim application and work on revised draft (.20); communication with A. Arundel and A. Moss on exhibits (.20); reviewed final interim petition (.20); communication with Weil Gotschall on interim fee application (.20).	4600	0.80	580.00
12/14/10	A.J. Moss	Reviewed Lloyd's excess policies and correspondence from broker regarding same (.2); communications with C. Rosenberg and J.A.C. Gross regarding same (.1); communications with C. Rosenberg regarding information request from excess carrier (.2); reviewed recent coverage-related correspondence received from Marsh (.1); reviewed substantive email from mediator and response from defense counsel (.2).	1300	0.80	400.00
12/14/10	A.J. Moss	Communications with C. Rosenberg and A. Arundel (.2); communications with C. Arthur	4600	0.80	400.00



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Date	Timekeeper	Description	Task	Hours	Amount
		regarding Interim Application (.2); reviewed revisions to Interim Application (.2); further communications with C. Rosenberg (.1); reviewed as-filed Interim Application (.1).			
12/14/10	J.A.C. Gross	Check on status of defense matters for Michael Stein matter (.4).	1300	0.40	100.00
12/14/10	E.A. Arundel	Finalize First Interim Fee Application.	4600	1.00	240.00
12/14/10	E.A. Arundel	Prepare Third Monthly Fee Statement and First Interim Fee Application.	4600	2.50	600.00
12/15/10	C.H. Rosenberg	Reviewed communication with mediator and defense counsel on mediation issues (.20); reviewed communication from M. Solinger (.10); reviewed update on Tule River (.10); communication with defense counsel (.10).	1300	0.50	362.50
12/16/10	M.S. Hersh	Reviewed recent emails and correspondence.	1300	0.30	174.00
12/16/10	M.S. Hersh	Responded to client inquiry regarding opt-outs.	1300	0.20	116.00
12/16/10	M.S. Hersh	Reviewed materials recently submitted to mediator.	1300	0.50	290.00
12/16/10	C.H. Rosenberg	Reviewed M. Armstrong's communication on Glickenhau (.10); reviewed V-CAP correspondence from Marsh regarding Lehman Commercial Corp. Asia (.10); reviewed additional claim correspondence provided by M. Armstrong (.30); reviewed communication from E. Albert on mediation and communication with carriers (.10);	1300	2.00	1,450.00



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Date	Timekeeper	Description	Task	Hours	Amount
		communication with M. Hersh on notices to carriers of matters (.10); reviewed additional coverage letters on multiple claims (.50); reviewed communication with Simpson defense counsel on mediation issues (.20); reviewed communication on Fuld (.10); reviewed communication on Tule River (.20); reviewed Hartford's coverage letter on V-CAP matter (.10); reviewed additional tender and letters from M. Armstrong (.20).			
12/16/10	A.J. Moss	Reviewed recently received coverage correspondence regarding various underlying Claims.	1300	0.20	100.00
12/16/10	J.A.C. Gross	Reviewed new carrier correspondence (.40); organized Marsh claim files (.3); organized carrier correspondence (1.10).	1300	1.80	450.00
12/17/10	M.S. Hersh	Exchanged emails regarding notice of opt-outs.	1300	0.20	116.00
12/17/10	M.S. Hersh	Analyzed notice issue.	1300	0.10	58.00
12/17/10	M.S. Hersh	Telephone conference with broker.	1300	0.10	58.00
12/17/10	C.H. Rosenberg	Reviewed L. McGarry's communication on carrier correspondence (.10); communication with M. Hersh on notices (.10); reviewed communication with Marsh (.10).	1300	0.30	217.50
12/20/10	C.H. Rosenberg	Reviewed Reynolds private equity correspondence from M. Armstrong (.10); reviewed Clyde & Co. response under D&O and ERISA coverage (.10); reviewed	1300	1.00	725.00





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Date	Timekeeper	Description	Task	Hours	Amount
		Angiolillo correspondence under Non-40 Act coverage (.10); reviewed Miron and Marcella correspondence (.10); reviewed Smolensky correspondence (.10); reviewed Lavin correspondence (.10); reviewed Lavin's correspondence from M. Armstrong (.10); reviewed additional correspondence from Marsh (.30).			
12/20/10	A.J. Moss	Reviewed recently received coverage correspondence from Marsh and various carriers.	1300	0.10	50.00
12/20/10	J.A.C. Gross	Continued review of correspondence received from Marsh.	1300	2.30	575.00
12/21/10	M.S. Hersh	Received recent correspondence and new claims (.3); telephone conferences with broker and defense counsel re AG case (.2); reviewed AG complaint (.2).	1300	0.70	406.00
12/21/10	A.J. Moss	Reviewed communications from R. Brew (Marsh) (.1); reviewed email from defense counsel (.1); reviewed NYAG v E&Y complaint and articles regarding same (.2); communications with M. Hersh regarding same (.1); reviewed recently received coverage correspondence from Chartis (.1)	1300	0.60	300.00
12/21/10	J.A.C. Gross	Reviewed and organized notice correspondence from Marsh (1.7); continued organization of substantive coverage correspondence (.50).	1300	2.20	550.00
12/22/10	M.S. Hersh	Exchange emails re AG complaint.	1300	0.20	116.00



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Date	Timekeeper	Description	Task	Hours	Amount
12/22/10	C.H. Rosenberg	Reviewed communication with D. Brew on carrier correspondence and communication (.10); reviewed communication with M. Hersh (.10).	1300	0.20	145.00
12/22/10	A.J. Moss	Reviewed email from R. Brew (Marsh) regarding NYAG v. E&Y action.	1300	0.10	50.00
12/22/10	J.A.C. Gross	Organized Lloyds and other upper level excess carrier correspondence.	1300	3.00	750.00
12/23/10	M.S. Hersh	Email to carriers.	1300	0.10	58.00
12/23/10	C.H. Rosenberg	Reviewed M. Hersh's update to the carriers.	1300	0.10	72.50
<b>Total Fees</b>				<b>149.60</b>	<b>\$80,015.00</b>

#### SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Title		Total
A.J. Moss	Partner	17.40 hrs @ \$ 500.00 / hr	8,700.00
C.H. Rosenberg	Partner	44.20 hrs @ \$ 725.00 / hr	32,045.00
E.A. Arundel	Paralegal	12.10 hrs @ \$ 240.00 / hr	2,904.00
J.A.C. Gross	Paralegal	23.20 hrs @ \$ 250.00 / hr	5,800.00
M.S. Hersh	Partner	52.70 hrs @ \$ 580.00 / hr	30,566.00



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<b>Total Professional Services</b>	<b>\$80,015.00</b>
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**DISBURSEMENTS (COSTS ADVANCED AND EXPENSES INCURRED)**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
12/31/2010	PACER	7.76
12/31/2010	Lexis	96.25
08/27/2010	Air Travel Expense VENDOR: Carolyn H. Rosenberg, Coach Travel from Chicago to New York on 12/2/2010 to attend mediation	265.40
08/27/2010	Air Travel Expense Travel Agent Fee - VENDOR: Carolyn H. Rosenberg, Coach Travel from Chicago to New York on 12/2/2010 to attend mediation	8.00
11/12/2010	Courier Service - Outside Outside 00843 UPS - Shipped from Carolyn H. Rosenberg Reed Smith LLP - Chicago to John Suckow and Davi Lehman Brothers Holdings In (NEW YORK NY 10020) 1Z6151400195110972	8.69
11/12/2010	Courier Service - Outside Outside 00843 UPS - Shipped from Carolyn H. Rosenberg Reed Smith LLP - Chicago to Andy Velez- Rivera/Tr Office of U.S. Trust. So Di (NEW YORK NY 10004) 1Z6151400195124967	8.69
11/12/2010	Courier Service - Outside Outside 00843 UPS - Shipped from Carolyn H. Rosenberg Reed Smith LLP - Chicago to D. Dunne, D. O'Donne Milbank, Tweed, Hadley & Mc (NEW YORK NY 10005) 1Z6151400197262582	8.69
11/12/2010	Courier Service - Outside Outside 00843 UPS - Shipped from Carolyn H. Rosenberg Reed Smith LLP - Chicago to Shai Y. Waisman, Esq Weil, Gotshal & Manges, LLP (NEW YORK NY 10153) 1Z6151400199315799	8.69



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11/12/2010	Courier Service - Outside Outside 00843 UPS - Shipped from REEDSMITH SACHNOFF AND WEAV to John Suckow and Davi Lehman Brothers Holdings In (NEW YORK NY 10020) 1Z6151400195110972	4.63
11/12/2010	Courier Service - Outside Outside 00843 UPS - Shipped from REEDSMITH SACHNOFF AND WEAV to Andy Velez- Rivera/Tr Office of U.S. Trust. So Di (NEW YORK NY 10004) 1Z6151400195124967	4.63
11/12/2010	Courier Service - Outside Outside 00843 UPS - Shipped from REEDSMITH SACHNOFF AND WEAV to D. Dunne, D. O'Donne Milbank, Tweed, Hadley & Mc (NEW YORK NY 10005) 1Z6151400197262582	6.05
11/15/2010	Air Travel Expense VENDOR: Carolyn H. Rosenberg, Nov 15, 2010 Coach Travel from Chicago to New York to attend mediation - AA 12/2/2010 travel	90.00
11/15/2010	Air Travel Expense VENDOR: Carolyn H. Rosenberg, Coach Travel from Chicago to New York to attend mediation - Agent fee to book AA 12/2/2010 travel	8.00
11/15/2010	Air Travel Expense VENDOR: Carolyn H. Rosenberg, Nov 15, 2010 Coach Travel from Chicago to New York, NY for mediation UNITED 01679362120973	205.40
11/15/2010	Air Travel Expense Travel Agent Fee - VENDOR: Carolyn H. Rosenberg, Nov. 15, 2010 Coach Travel from Chicago to New York, NY for mediation AGNT FEE 89005412774143	8.00
11/15/2010	Air Travel Expense Air Travel Agent Fee - VENDOR: Mark S. Hersh, Nov 15, 2010 Attend mediation. Coach Travel from Chicago to New York City and back.	8.00



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Date	Description	Amount
11/15/2010	Air Travel Expense VENDOR: Mark S. Hersh, Nov 15, 2010 Attend mediation. Coach Travel from Chicago to New York City and back.	205.40
11/15/2010	Air Travel Expense Travel Agent Fee - VENDOR: Mark S. Hersh, Nov 15, 2010 Attended mediation . Coach Travel from Chicago to New York City and back.	8.00
11/15/2010	Air Travel Expense VENDOR: Mark S. Hersh, Nov 15, 2010 Attended mediation . Coach Travel from Chicago to New York City and back.	202.40
11/19/2010	Telephone - Outside Telephone - Outside Global Crossing Inv No: 9032985913 - HERSH, MARK	73.84
11/23/2010	Courier Service - Outside Outside 00843 UPS - Shipped from Jane Anne Conway Gro Reed Smith LLP - Chicago to Jed Melnick, Esq. (AMBLER PA 19002) Jane Anne Conway Gross 1Z6151400193056973	17.45
11/23/2010	Courier Service - Outside Outside 00843 UPS - Shipped from Jane Anne Conway Gro Reed Smith LLP - Chicago to Case Manager Scott Schreiber (SAN FRANCISCO CA 94111) Jane Anne Conway Gross 1Z6151400193249596	17.68
11/23/2010	Courier Service - Outside Outside 00843 UPS - Shipped from Jane Anne Conway Gro Reed Smith LLP - Chicago to Michelle Yoshida, Esq. (NAPA CA 94558) Jane Anne Conway Gross 1Z6151400193902389	20.39
11/29/2010	Air Travel Expense VENDOR: Carolyn H. Rosenberg, Nov 29, 2010 Coach Travel from Chicago to New York, NY for mediation UNITED 0164063817962	39.00



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Date	Description	Amount
11/29/2010	Air Travel Expense VENDOR: Carolyn H. Rosenberg, Nov 29, 2010 Coach Travel from Chicago to New York, NY for mediation UNITED 0164064482046	39.00
12/02/2010	Lodging VENDOR: Mark S. Hersh, Dec 02, 2010 Attend mediation. Travel from Chicago to New York City and back.	497.77
12/02/2010	Air Travel Expense Baggage Fees - VENDOR: Mark S. Hersh, Dec 02, 2010 Attend mediation. Coach Travel from Chicago to New York City and back.	9.00
12/02/2010	Taxi Expense VENDOR: Mark S. Hersh, Dec 02, 2010 Attend mediation. Coach Travel from Chicago to New York City and back.	36.00
12/02/2010	Taxi Expense Shuttle - VENDOR: Carolyn H. Rosenberg, Dec 2 and Dec 3, 2010 Shuttle to airport for travel to/from New York to attend mediation	80.00
12/02/2010	Meal Expense VENDOR: Mark S. Hersh and Carolyn H. Rosenberg, Dec 02, 2010 Attend mediation. Travel from Chicago to New York City and back.	127.79
12/02/2010	Meal Expense VENDOR: Mark S. Hersh, Dec 02, 2010 Attend mediation. Travel from Chicago to New York City and back.	14.32
12/02/2010	Meal Expense VENDOR: Carolyn H. Rosenberg, Dec 02, 2010 Travel from Chicago to New York to attend mediation - Lunch at airport prior to flight	8.66
12/02/2010	General Expense VENDOR: Mark S. Hersh, Dec 02, 2010 Attend mediation. Travel from Chicago to New York City and back.	13.95
12/03/2010	Air Travel Expense Travel Agent Fee - VENDOR: Mark S. Hersh, Dec 03, 2010 Attend mediation. Coach Travel from Chicago to New York City and back.	24.00



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Date	Description	Amount
12/03/2010	Air Travel Expense VENDOR: Mark S. Hersh, Dec 03, 2010 Attend mediation. Coach Travel from Chicago to New York City and back.	50.00
12/03/2010	Air Travel Expense VENDOR: Carolyn H. Rosenberg, Dec 03, 2010 Coach Travel from Chicago to New York to attend mediation - American Airlines charge to return on early flight.	50.00
12/03/2010	Air Travel Expense VENDOR: Carolyn H. Rosenberg, Dec 03, 2010 Coach Travel from Chicago to New York to attend mediation - American Airlines charge to return on early flight.	50.00
12/03/2010	Air Travel Expense Baggage Fees - VENDOR: Carolyn H. Rosenberg, Dec 3, 2010 Coach Travel from Chicago to New York to attend mediation	50.00
12/03/2010	Air Travel Expense Travel Agent Fee - VENDOR: Carolyn H. Rosenberg, Coach Travel from Chicago to New York to attend mediation - Agent fee to return on early flight on 12/3/2010	24.00
12/03/2010	Taxi Expense VENDOR: Carolyn H. Rosenberg, Dec 03, 2010 Coach Travel from Chicago to New York to attend mediation - taxi from The Benjamin to JAMS to attend mediation	11.00
12/03/2010	Taxi Expense VENDOR: Mark S. Hersh, Dec 03, 2010 Attend mediation. Coach Travel from Chicago to New York City and back - taxi from JAMS to LGA.	35.00
12/03/2010	Taxi Expense VENDOR: Mark S. Hersh, Dec 03, 2010 Attend mediation. Coach Travel from Chicago to New York City and back- taxi from ORD to home.	39.00



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12/03/2010	Taxi Expense Shuttle - VENDOR: Carolyn H. Rosenberg, Dec Shuttle to airport for travel to/from New York to attend mediation on 12/2/2010 and 12/3/2010.	80.00
12/03/2010	Meal Expense VENDOR: Mark S. Hersh, Dec 03, 2010 Attend mediation. Travel from Chicago to New York City and back.	9.74
12/04/2010	Lodging VENDOR: Carolyn H. Rosenberg, Dec 04, 2010 Travel from Chicago to New York to attend mediation.	497.77
12/05/2010	Taxi Expense VENDOR: Mark S. Hersh, Dec 05, 2010 Attended mediation . Coach Travel from Chicago to New York City and back - taxi to ORD.	54.00
12/05/2010	Taxi Expense Shuttle - VENDOR: Carolyn H. Rosenberg, Dec Shuttle to airport for travel to/from New York to attend mediation on 12/5/2010 and 12/6/2010	80.00
12/05/2010	Meal Expense VENDOR: Mark S. Hersh, Dec 05, 2010 Attended mediation . Travel from Chicago to New York City and back.	9.87
12/05/2010	Meal Expense VENDOR: Carolyn H. Rosenberg, Dec 05, 2010 Travel from Chicago to New York, NY for mediation - dinner at ORD prior to flight	13.43
12/05/2010	General Expense VENDOR: Mark S. Hersh, Dec 05, 2010 Attended mediation . Travel from Chicago to New York City and back.	13.95
12/06/2010	Air Travel Expense VENDOR: Carolyn H. Rosenberg, Dec 06, 2010 Coach Travel from Chicago to New York, NY for mediation - earlier return flight	75.00
12/06/2010	Taxi Expense VENDOR: Mark S. Hersh, Dec 06, 2010 Attended mediation. - taxi from hotel to JAMS.	11.00





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Date	Description	Amount
12/06/2010	Taxi Expense Shuttle - VENDOR: Carolyn H. Rosenberg, Dec 5 and Dec 6, 2010 Shuttle to airport for travel to/from New York to attend mediation	80.00
12/06/2010	Meal Expense VENDOR: Mark S. Hersh, Dec 06, 2010 Attended mediation . Travel from Chicago to New York City and back.	8.69
12/06/2010	Meal Expense VENDOR: Mark S. Hersh, Dec 06, 2010 Attended mediation . Travel from Chicago to New York City and back.	45.02
12/06/2010	Meal Expense VENDOR: Carolyn H. Rosenberg, Dec 06, 2010 Travel from Chicago to New York, NY for mediation - dinner at LGA prior to flight	16.30
12/06/2010	General Expense VENDOR: Mark S. Hersh, Dec 06, 2010 Attended mediation . Travel from Chicago to New York City and back.	13.95
12/07/2010	Lodging VENDOR: Mark S. Hersh, Dec 07, 2010 Attended mediation. Two night stay. Travel from Chicago to New York City and back.	989.62
12/07/2010	Lodging VENDOR: Carolyn H. Rosenberg, Dec 07, 2010 Travel New York, NY for mediation - breakfast at hotel	442.41
12/07/2010	Air Travel Expense VENDOR: Mark S. Hersh, Dec 07, 2010 Attended mediation . Coach travel from Chicago to New York City and back.	75.00
12/07/2010	Taxi Expense VENDOR: Mark S. Hersh, Dec 07, 2010 Attended mediation . Coach Travel from Chicago to New York City and back - taxi from ORD to home.	54.00
12/07/2010	Taxi Expense VENDOR: Mark S. Hersh, Dec 07, 2010 Attended mediation . Travel to New York City and bac - taxi from hotel to JAMS.	15.00



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Date	Description	Amount
12/07/2010	Taxi Expense VENDOR: Mark S. Hersh, Dec 07, 2010 Attended mediation . Coach Travel from Chicago to New York City and back - taxi from JAMS to LGA.	34.00
12/07/2010	Taxi Expense VENDOR: Carolyn H. Rosenberg, Dec 07, 2010 Travel to New York, NY for mediation - Cab to LGA	36.97
12/07/2010	Meal Expense VENDOR: Carolyn H. Rosenberg, Dec 07, 2010 Travel to New York, NY for mediation - breakfast at hotel	6.53
12/10/2010	Courier Service - Outside Outside 00843 UPS - Shipped from REEDSMITH SACHNOFF AND WEAV to John Suckow and Davi Lehman Brothers Holdings In (NEW YORK NY 10020) 1Z6151400199091236	6.13
12/10/2010	Courier Service - Outside Outside Service - Outside 00843 UPS - Shipped from REEDSMITH SACHNOFF AND WAEV to D. Dunne, D. 'Donne Milbank, Tweed, Hadley & Mc (NEW YORK 10005) 1Z6151400195723257	6.13
12/10/2010	Courier Service - Outside Outside 00843 UPS - Shipped from REEDSMITH SACHNOFF AND WEAV to Andy Velez-Rivera/Tr Office of U.S. Trust. So Di (NEW YORK NY 10004) 1Z6151400195751664	6.13
12/10/2010	Courier Service - Outside Outside 00843 UPS - Shipped from Carolyn H. Rosenberg Reed Smith LLP - Chicago to Shai Y. Waisman, Esq Weil, Gotshal & Manges, LLP (NEW YORK NY 10153) 1Z6151400195188443	8.81
12/10/2010	Courier Service - Outside Outside 00843 UPS - Shipped from Carolyn H. Rosenberg Reed Smith LLP - Chicago to D. Dunne, D. O'Donne Milbank, Tweed, Hadley & Mc (NEW YORK NY 10005) 1Z6151400195723257	8.81



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12/10/2010	Courier Service - Outside Outside 00843 UPS - Shipped from Carolyn H. Rosenberg Reed Smith LLP - Chicago to Andy Velez- Rivera/Tr Office of U.S. Trust. So Di (NEW YORK NY 10004) 1Z6151400195751664	8.81
12/10/2010	Courier Service - Outside Outside 00843 UPS - Shipped from Carolyn H. Rosenberg Reed Smith LLP - Chicago to John Suckow and Davi Lehman Brothers Holdings In (NEW YORK NY 10020) 1Z6151400199091236	8.81
12/14/2010	Courier Service - Outside Outside 00843 UPS - Shipped from Carolyn H. Rosenberg Reed Smith LLP - Chicago to Andy Velez- Rivera/Tr Office of U.S. Trust. So Di (NEW YORK NY 10004) 1Z6151400195438691	18.12
12/14/2010	Courier Service - Outside Outside 00843 UPS - Shipped from Carolyn H. Rosenberg Reed Smith LLP - Chicago to Shai Y. Waisman, Esq Weil, Gotshal & Manges, LLP (NEW YORK NY 10153) 1Z6151400196113502	18.12
12/14/2010	Courier Service - Outside Outside 00843 UPS - Shipped from Carolyn H. Rosenberg Reed Smith LLP - Chicago to Kenneth R. Feinberg, Feinberg Rozen, LLP (WASHINGTON DC 20004) 1Z6151400197305875	16.46
12/14/2010	Courier Service - Outside Outside 00843 UPS - Shipped from Carolyn H. Rosenberg Reed Smith LLP - Chicago to D. Dunne, D. O'Donne Milbank, Tweed, Hadley & Mc (NEW YORK NY 10005) 1Z6151400198601481	18.12
12/14/2010	Courier Service - Outside Outside 00843 UPS - Shipped from Carolyn H. Rosenberg Reed Smith LLP - Chicago to John Suckow and Davi Lehman Brothers Holdings In (NEW YORK NY 10020) 1Z6151400199415869	18.12



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Date	Description	Amount
12/29/2010	Taxi Expense VENDOR: FLASH CAB: Late night cab fare 11/17/10	37.73
12/29/2010	Taxi Expense VENDOR: FLASH CAB: Late night cab fare 11/17/10	40.08
<b>Current Costs and Expenses</b>		<b>\$5,373.16</b>

#### INVOICE SUMMARY

Total Fees	\$ 80,015.00
Disbursements	\$ <u>5,373.16</u>
<b>TOTAL CURRENT INVOICE DUE</b>	<b>\$ <u>85,388.16</u></b>

#### SUMMARY OF TIME BILLED BY TASK:

Task Code	Description	Hours	Amount
1300	Insurance Issues	130.00	72,731.00
4600	Firm's Own Billing/Fee Applications	19.60	7,284.00
	<b>Matter Total</b>	<b>149.60</b>	<b>\$80,015.00</b>

dbappadm

ReedSmith

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Lehman Brothers Holdings Inc.  
1271 Avenue of the Americas, 38th Floor  
New York, NY 10020

Invoice Number: **2091834**  
Invoice Date: **2/14/2011**  
Client Number: **330015**  
Matter Number: **00001**

**RE: Chapter 11 Special Insurance Coverage Counsel 1/1/2011 through 1/31/2011**

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**INVOICE SUMMARY**

Total Current Fees .....	\$ 76,770.00
Total Current Disbursements .....	<u>144.74</u>
<b>Total Due This Invoice:</b>	<b>\$ <u><u>\$76,914.74</u></u></b>

Please Remit to:

*Mail To:*  
Reed Smith LLP  
2672 Paysphere Circle  
Chicago, IL 60674

*Wire Instructions:*  
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Chicago, IL  
ABA Number: 0260-0959-3  
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Invoice Date: **2/14/2011**  
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Matter Number: **00001**

**RE: Chapter 11 Special Insurance Coverage Counsel**

**DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH January 31, 2011**

Date	Timekeeper	Description	Task	Hours	Amount
01/03/11	M.S. Hersh	Telephone conference with defense counsel re status, strategy (.4); analyzed strategic issues, next steps (.6); reviewed mediation notes (.3)	1300	1.30	754.00
01/03/11	C.H. Rosenberg	Reviewed coverage correspondence from Chubb from M. Armstrong (.10); communication with M. Hersh on developments (.10); telephone conference with defense counsel on developments and mediation (.20); communication with M. Hersh on mediation issues (.20); communication with defense counsel on mediation issues (.10); communication with M. Solinger on logistics (.10); communication with JAMS (.10); communication with A. Moss on research (.10).	1300	1.00	725.00
01/03/11	A.J. Moss	Communications with M. Hersh regarding mediation (.1); reviewed email from M. Solinger and defense counsel regarding same (.1); reviewed recently received coverage correspondence from Marsh (.1).	1300	0.30	150.00
01/04/11	M.S. Hersh	Analyzed strategic issues to prepare for telephone conference	1300	4.10	2,378.00



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Date	Timekeeper	Description	Task	Hours	Amount
		with defense counsel (2.8); reviewed recent SASCO and other claims correspondence (.2); exchanged emails with carrier representatives (.1); review recent email (.1); worked on mediation scheduling issues and logistics (.9).			
01/04/11	C.H. Rosenberg	Reviewed Chartis 12/14/10 letter on Glickenhau (.10); reviewed Chartis' 12/13/10 letter (.10); reviewed Clyde & Co.'s 12/20/10 letter (.10); reviewed communication from K. Melvin (.10); reviewed response to K. Melvin (.10); reviewed communication from Chartis on VC matter (.10); reviewed communication from mediator (.10); reviewed communication with defense counsel and M. Solinger on mediation issues (.20); reviewed status request on VC claim from Chartis (.10); communication with Lehman counsel on request (.10); communication with M. Hersh on mediation status and developments (.10); meeting with M. Hersh on mediation strategy (.30); reviewed communication with R. Lusk and E. Albert (.10); reviewed communication from D. Brew (.10); communication with M. Hersh on status of case per Chartis's request (.10); communication with M. Hersh on mediation dates and logistics (.10); communication with M. Solinger and defense counsel on mediation issues (.20); communication with M. Hersh on	1300	2.20	1,595.00



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Date	Timekeeper	Description	Task	Hours	Amount
		strategy (.10); reviewed communication with E. McGarry (.10).			
01/04/11	C.H. Rosenberg	Communication with A. Moss on monthly fee application.	4600	0.10	72.50
01/04/11	A.J. Moss	Telephone call with M. Hersh to discuss coverage issues (.2); reviewed notes of conference calls (.2); reviewed recent coverage correspondence received from Marsh (.2); reviewed email from client representatives and defense counsel regarding mediation (.1); reviewed email from CNA and HCC representatives regarding mediation logistics (.1).	1300	0.80	400.00
01/05/11	M.S. Hersh	Worked on mediation scheduling issues (.9); met with colleagues to discuss strategy re mediation, SASCO issues (1.6); telephone conferences client and defense counsel re mediation scheduling, strategy (1.5).	1300	4.00	2,320.00
01/05/11	C.H. Rosenberg	Reviewed E&Y complaint correspondence from M. Armstrong (.30); communication with defense counsel and M. Solinger on mediation dates (.30); meeting with M. Hersh to analyze coverage and strategy issues (1.00); conference call with defense counsel to address mediation issues (1.00); conference calls with M. Solinger and defense counsel to address mediation issues (.50); reviewed communication with M. Solinger on mediation (.20); reviewed exhibits to notice letters from M.	1300	3.90	2,827.50





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Date	Timekeeper	Description	Task	Hours	Amount
		Armstrong (.30); reviewed private equity Advisers correspondence from M. Armstrong (.20); reviewed communication on Tule River mediation (.10).			
01/05/11	A.J. Moss	Reviewed correspondence from D. Brew (Marsh) regarding E&Y matter (.1); reviewed email from client representatives and defense counsel regarding mediation logistics (.1); meeting with C. Rosenberg and M. Hersh to discuss coverage and strategic issues (.5); teleconference with defense counsel, C. Rosenberg and M. Hersh (.6); teleconference with M. Solinger, defense counsel, C. Rosenberg and M. Hersh (.3); further teleconference with M. Solinger, defense counsel, C. Rosenberg and M. Hersh (.5); reviewed and analyzed statements of claim in various auction rate securities-related FINRA cases (.5); reviewed primary D&O policies (.2); communications with M. Hersh regarding same (.2); communications with K. Melvin (CNA/HCC) (.2); further communications with M. Hersh (.1); reviewed recent coverage-related correspondence received from broker (.2); reviewed email from defense counsel and carrier counsel regarding Tule River ARS mediation (.1).	1300	3.60	1,800.00
01/05/11	A.J. Moss	Communications with C. Rosenberg and A. Arundel regarding monthly statement.	4600	0.20	100.00
01/05/11	E.A. Arundel	Review compensation order and	4600	0.20	48.00



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Date	Timekeeper	Description	Task	Hours	Amount
		confirm due date of fee statement.			
01/06/11	M.S. Hersh	Telephone conference with carrier counsel (.5); telephone conference with defense counsel re mediation strategy and scheduling (.7).	1300	1.20	696.00
01/06/11	C.H. Rosenberg	Reviewed further communication on Tule River (.20); communication with M. Hersh on mediation issues (.10); reviewed communication from Marsh (.10); reviewed communication from defense counsel on mediation issues (.20); telephone conference with M. Hersh, M. Solinger and defense counsel (.70); reviewed follow-up communication with mediator (.10); reviewed communication with M. Hersh (.10).	1300	1.60	1,160.00
01/06/11	A.J. Moss	Worked on invoice for submission of monthly fee statement.	4600	0.30	150.00
01/06/11	A.J. Moss	Teleconference with K. Melvin, M.C. Martin (HCC/CNA) and M. Hersh (.4); telephone call with M. Hersh (.1); communications with K. Melvin regarding Tule River ARS claim (.1); telephone call with E. Albert (.2); telephone call with D. Brew (Marsh) (.3); further telephone call with M.C. Martin (.2); communications with M. Hersh regarding same (.2); communications with C. Rosenberg (.1); reviewed email from K. Melvin regarding Tule River ARS claim (.1); reviewed analysis of issues in underlying claims (.2); meeting with C.	1300	3.60	1,800.00



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Date	Timekeeper	Description	Task	Hours	Amount
		Rosenberg (.1); teleconference with M. Solinger, E. Albert, defense counsel, C. Rosenberg and M. Hersh to discuss mediation logistics and coverage issues (.6); reviewed auction rate securities claim materials (.5); meeting with J.A.C. Gross to discuss coverage correspondence review (.2); reviewed correspondence from E&O carriers (.3).			
01/06/11	J.A.C. Gross	Conferred with A. Moss regarding carrier correspondence for US Airways, Essex, Tule River and Maxxim Claims (.3); researched IMI files to obtain coverage correspondence on these matters (.7); researched Marsh claim files and digital files for same (1.4).	1300	2.40	600.00
01/07/11	M.S. Hersh	Prepare for telephone conference with mediator (.1); reviewed email on SASCo coverage issue (.2); telephone conference with mediator (.5); email to carrier representative (.2); worked on strategic issues re mediation (.2).	1300	1.20	696.00
01/07/11	C.H. Rosenberg	Reviewed correspondence from M. Armstrong (.20); participated in conference call on mediation with defense counsel and M. Solinger (.50); follow-up communication with M. Hersh and carriers on mediation dates (.20); communication with M. Solinger on dates (.10); further communication from M. Armstrong on claims (.10); communication with carriers on mediation (.20).	1300	1.30	942.50



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Date	Timekeeper	Description	Task	Hours	Amount
01/07/11	A.J. Moss	Teleconference with M. Solinger, D. Weinstein (JAMS), J. Melnick (JAMS), defense counsel, C. Rosenberg and M. Hersh to discuss mediation logistics (.3); communications with J. Hersh regarding same (.1); reviewed recently received coverage correspondence from Marsh (.1); reviewed and analyzed coverage correspondence from D&O and E&O insurers regarding various auction rate securities claims (.7); reviewed primary D&O and E&O policies with respect to same (.4); reviewed and analyzed research regarding various coverage issues (1.5); reviewed email from defense and carrier counsel regarding Tule River ARS matter (.1).	1300	3.20	1,600.00
01/07/11	J.A.C. Gross	Compiled multiple items of correspondence and complaints to A. Moss per his request.	1300	0.80	200.00
01/10/11	M.S. Hersh	Multiple emails and telephone conferences with colleagues re mediation scheduling and strategy.	1300	0.50	290.00
01/10/11	C.H. Rosenberg	Reviewed correspondence from M. Armstrong (Marsh) on D&O policy claims (.20); reviewed communication with mediator on additional mediations (.20); communication with M. Solinger on mediation (.10); communication with M. Hersh on mediation issues and logistics (.20); reviewed additional communication from J. Melnick (JAMS) (.10); reviewed communication from carrier	1300	0.90	652.50



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Date	Timekeeper	Description	Task	Hours	Amount
		representatives (.10).			
01/10/11	C.H. Rosenberg	Reviewed December invoice for monthly fee petition (.50); communication with A. Moss on revisions or questions on monthly fee submission (.20); communication with M. Hersh on monthly fee submission (.10).	4600	0.80	580.00
01/10/11	A.J. Moss	Reviewed recently received coverage correspondence from Marsh (.1); communications with M. Hersh regarding mediation issues (.1).	1300	0.20	100.00
01/11/11	M.S. Hersh	Worked on mediation logistical issues (.2); worked on response to mediator request for insurance information (.8); analyzed strategic issues re ARS mediation (.4); reviewed recent claim correspondence (.2).	1300	1.60	928.00
01/11/11	C.H. Rosenberg	Worked on monthly fee petition (.10); reviewed further draft submission (.50).	4600	0.60	435.00
01/11/11	C.H. Rosenberg	Reviewed communication on mediation (.10); reviewed correspondence from M. Armstrong (.10); communication with M. Hersh and J. Melnick on mediation (.20); communication with defense counsel (.10); reviewed communication relating to opt-out litigation (.20); reviewed communication with J. Melnick (.20); communication with carriers and M. Armstrong on new tenders under D&O and V-CAP programs (.30); met with M. Hersh regarding ARS mediation (.20); communication with J. Melnick (JAMS) (.10); reviewed	1300	1.90	1,377.50



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Date	Timekeeper	Description	Task	Hours	Amount
		communication with defense counsel and J. Melnick (.10); communication with M. Solinger on mediation (.10); reviewed letter from defense counsel (.10); communication with M. Hersh (.10).			
01/11/11	A.J. Moss	Worked on preparation of invoice for monthly statement (.7); communications with C. Rosenberg regarding same (.1).	4600	0.80	400.00
01/11/11	A.J. Moss	Reviewed recently received correspondence from various D&O carriers regarding new matters (.3); meeting with C. Rosenberg and M. Hersh to discuss mediations and ARS matters (.2); meeting with L. Raines to discuss research project and policy review (.2); reviewed IMI policy and correspondence from Chartis regarding ARS matters (1.4); reviewed substantive email from defense counsel and K. Melvin (CNA/HCC) regarding Tule River mediation (.1).	1300	2.20	1,100.00
01/11/11	E.A. Arundel	Worked on Fourth Monthly Fee Statement.	4600	1.50	360.00
01/12/11	M.S. Hersh	Reviewed recent claims correspondence (.3); communications with colleagues re tracking claims (.1); exchanged emails with A. Moss re coverage for ARS cases (.4).	1300	0.80	464.00
01/12/11	C.H. Rosenberg	Review M. Armstrong's communication on Parker and Mazzolin matters from carriers (.30); review correspondence from AWAC on securities and	1300	1.50	1,087.50



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Date	Timekeeper	Description	Task	Hours	Amount
		ERISA litigation (.10); review XL and Chartis correspondence on Mazzolin and Lavin matters (.20); communication with J. Conway Gross on analysis of coverage letters (.10); review carrier correspondence and exhibits (.20); review Chartis letter on Glickehaus (.10); review coverage letter on Fried (.10); review charts correspondence on Parker (.10); review Chartis excess carrier letter (.10); review correspondence on Balles from Zurich (.10); review exhibits to correspondence from M. Armstrong (.10).			
01/12/11	L.J. Raines	Reviewed and analyzed policy provisions on insurance coverage issues (.4); research regarding application of multiple clauses under D&O policies (1.3).	1300	1.70	748.00
01/12/11	A.J. Moss	Communications with L. Raines regarding coverage issues (.1); analyzed primary investment management E&O policy (.7); further reviewed coverage correspondence from E&O carriers (.4); reviewed and analyzed Tule River, Essex, US Air and American Eagle FINRA statements of claim (2.4); researched, reviewed and analyzed cases on application of policy exclusion (.8); reviewed provisions of '34 Act regarding same (.2); worked on substantive analysis of same for M. Hersh (.5); further communications with same (.3).	1300	5.40	2,700.00
01/13/11	M.S. Hersh	Reviewed recent emails (.2);	1300	4.10	2,378.00



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Date	Timekeeper	Description	Task	Hours	Amount
		drafted emails to colleagues and client re ARS coverage issue (.4); responded to mediator request (1.2); analyzed ARS coverage issues (.2); reviewed opinion letter re "relatedness" issue along with cover letter (.8); telephone conferences with defense counsel in American Eagle ARS Claim (.3); drafted emails to client re American Eagle case (.4); reviewed draft memo on SASCo issues (.2).			
01/13/11	C.H. Rosenberg	Review communication from J. Melnick (JAMS) on mediation (.10); communication with M. Hersh on J. Melnick's inquiry (.10); communication with A. Moss (.10); review communication from M. Solinger on mediation (.10) review update from defense counsel (.10); communication with defense counsel and M. Solinger (.10) review communication from J. Melnick (.10); review SASCo plaintiffs' communication and report (.50); communication with M. Hersh on strategy and recently reviewed materials (.10); review proposed draft response to J. Melnick's inquiry (.30); review communication with Haber claim (.10); communication with M. Hersh and defense counsel on mediations (.20); review draft memo from defense counsel (.30) communication with defense counsel and M. Hersh (.10); review communication from M. Solinger (.10) review defense counsel communication on case	1300	2.50	1,812.50





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Date	Timekeeper	Description	Task	Hours	Amount
		list and status (.10).			
01/13/11	A.J. Moss	Communications with C. Rosenberg and M. Hersh regarding mediation issues (.2); reviewed newly received correspondence from various carriers (.2); reviewed correspondence from M. Hersh regarding coverage analysis from mediation neutral (.1); analyzed same (.5).	1300	1.00	500.00
01/13/11	J.A.C. Gross	Researched American Eagle ARS Claims information for M. Hersh.	1300	0.30	75.00
01/14/11	M.S. Hersh	Exchanged emails with colleagues, defense counsel, mediator re issues and logistics re mediation (.7); reviewed and exchanged emails re memo re SASCO coverage issues (.9); reviewed letter from Chubb (.2); analyzed ARS coverage issue (.6); analyzed issues re Chubbs attendance at mediation (.2); reviewed emails re scheduling of mediation sessions (.2); worked on response to mediator inquiry re insurance exposure (.9); worked on response to mediator inquiry re insurance exposure (.9); worked on response to insurance inquiry from ESSEX ARS claimant (1.1); draft email to client on ARS coverage issue (.8).	1300	5.40	3,132.00
01/14/11	C.H. Rosenberg	Review draft memo from defense counsel (.20); communication with M. Hersh re same (.20); review client's comments on draft (.10); review letters from Chubb	1300	2.70	1,957.50



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Date	Timekeeper	Description	Task	Hours	Amount
		from M. Armstrong (.30); communication with R. Lusk on letters (.10); communication with M. Hersh on draft reply (.10); review and respond to communications on mediations and materials for the parties (.30); communication with M. Hersh on strategic issues (.20); review communication from M. Solinger (.10); review communication from R. Lusk and Chubb (.30); review revised memo per defense counsel (.10); communication with M. Hersh on memo (.10); review communication with J. Melnick (JAMS) on mediation (.10); communication with J. Weinstein (.10); review communication on coverage and positions of carriers (.20); review communication with R. Lusk and M. Solinger on ARS claims (.10); communication with M. Hersh on opt-out claims (.10).			
01/14/11	C.H. Rosenberg	Review draft monthly fee petition (.30); communication with A. Arundel re revision to draft (.10); review revisions (.10).	4600	0.50	362.50
01/14/11	A.J. Moss	Reviewed multiple email messages from defense counsel and M. Hersh regarding mediation scheduling.	1300	0.20	100.00
01/14/11	J.A.C. Gross	Researched Essex coverage correspondence for M. Hersh (.70); organized coverage correspondence and complaints for claims on list of active claims (1.50).	1300	2.20	550.00
01/15/11	C.H.	Review M. Hersh's	1300	0.10	72.50



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Date	Timekeeper	Description	Task	Hours	Amount
	Rosenberg	communication to J. Melnick (JAMS) on mediation cases and reported matters under policies (.10).			
01/15/11	J.A.C. Gross	Gathered and organized complaints and correspondence for certain claims per request of M. Hersh (1.7); organized emails from Marsh (.6).	1300	2.30	575.00
01/17/11	C.H. Rosenberg	Review communication on mediations (.20); communication with M. Hersh (.10).	1300	0.30	217.50
01/18/11	M.S. Hersh	Continued work on response to mediator inquiry re claims under 07-08 policies including review of numerous complaints and correspondence (2.1); responded to mediator inquiry re IMI coverage for ARS caps (1.2); worked on mediator logistics (.4); telephone conference with E. Albert re ARS mediation issues (.2); exchange emails with client and defense counsel re mediation issues (.9).	1300	4.80	2,784.00
01/18/11	C.H. Rosenberg	Communication with M. Hersh on mediation (.10); reviewed proposed communication to mediator (.10); reviewed revised and final versions (.10); communication with M. Solinger on mediation and next steps (.10); reviewed communication on ARS, and other cases (.30); communication with M. Hersh on strategy (.10); communication with K. Melvin (HCC/CNA) on mediation (.10); communication with M. Hersh on drafts (.10); reviewed communication from E.	1300	1.10	797.50



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Date	Timekeeper	Description	Task	Hours	Amount
		Albert (.10).			
01/18/11	A.J. Moss	Reviewed communications from M. Hersh regarding ARS mediation issues (.2); reviewed and commented on proposed correspondence to mediator and defense counsel (.2); reviewed comments from client representatives and defense counsel regarding same (.1); reviewed correspondence from K. Melvin (HCC/CNA) regarding opt-out mediation meeting (.1).	1300	0.60	300.00
01/18/11	J.A.C. Gross	Researched Ray Davis Claim for M. Hersh.	1300	0.40	100.00
01/19/11	M.S. Hersh	Drafted emails to mediator and carrier re mediation issue (1.4); exchange emails with colleagues and client re mediation issues (.9); worked on mediation logistics (.9); telephone conference with counsel on ESSEX ARS mediation (.6); drafted email to client re ESSEX ARS mediation (.3); worked on arranging conference call with carrier (.3); telephone conference with defense counsel re mediation strategy (.2); reviewed emails re mediation issues (.5).	1300	5.10	2,958.00
01/19/11	C.H. Rosenberg	Reviewed communication regarding mediation materials, logistics and scheduling (.20); communication with M. Hersh (.10); communication with M. Solinger and defense counsel on mediation calls and preparation (.20); reviewed communication with J. Melnick (JAMS) (.10); reviewed communication with K.	1300	1.30	942.50



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Date	Timekeeper	Description	Task	Hours	Amount
		Melvin (HCC/CNA) (.10); reviewed correspondence (.20); communication with defense counsel on issues for mediation (.20); communication with M. Hersh on strategy (.20).			
01/19/11	A.J. Moss	Reviewed substantive communications regarding mediation.	1300	0.20	100.00
01/19/11	A.J. Moss	Reviewed email from defense counsel regarding ARS matters and potential coverage (.1); communications with M. Hersh to discuss potential E&O coverage issues (.1).	1300	0.20	100.00
01/20/11	M.S. Hersh	Emails to mediator (.2); exchanged emails with colleagues and client re mediation strategy (.9); reviewed Tule River memo (.2).	1300	1.30	754.00
01/20/11	C.H. Rosenberg	Reviewed communication with defense counsel on mediation and preparation (.20); reviewed communication to J. Melnick (.10); reviewed inquiry from J. Melnick (JAMS) (.10); reviewed communication from defense counsel (.10); reviewed Tule River analysis (.30); communication with M. Hersh on conference with carriers (.10).	1300	0.90	652.50
01/20/11	A.J. Moss	Reviewed discussion of relation- back and other coverage issues from counsel for D&O carriers (.2); communications with C. Rosenberg (.1); reviewed correspondence from mediator, defense counsel and carrier counsel regarding opt-out	1300	0.40	200.00



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Date	Timekeeper	Description	Task	Hours	Amount
		mediation (.1).			
01/21/11	M.S. Hersh	Communications with colleagues, mediator and client re opt-out mediation (.7); telephone conference with E. Albert re ESSEX ARS mediation coverage issues (.3); prepare for telephone conference with ESSEX plaintiffs coverage counsel (.2); prepare for telephone conference with mediator re opt-out (.3); telephone conference with mediator re opt-outs (.5); telephone conference with client, defense counsel re strategy (.6).	1300	2.60	1,508.00
01/21/11	C.H. Rosenberg	Communication with M. Solinger on call with mediator (.10); communication with J. Melnick (JAMS) (.20); conference call with mediator and carrier representatives (.50); follow-up conference call with defense counsel (.30); communication with M. Hersh on strategy (.10); communication with A. Moss (.10); reviewed communication from defense counsel (.10).	1300	1.40	1,015.00
01/21/11	A.J. Moss	Telephone call with M. Hersh to discuss E&O issues and mediation (.2); reviewed email from defense counsel regarding same (.1); reviewed research on broker-dealer exclusions issues (.2); teleconference with client representatives to discuss mediation (.1); communications with M. Hersh regarding same (.1).	1300	0.70	350.00
01/21/11	J.A.C. Gross	Organized XL correspondence.	1300	0.20	50.00



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Date	Timekeeper	Description	Task	Hours	Amount
01/22/11	A.J. Moss	Reviewed email from JAMS regarding opt-out mediation meetings (.1); communications with M. Hersh regarding same (.1).	1300	0.20	100.00
01/24/11	M.S. Hersh	Reviewed recent claims correspondence (.8); analyzed issues re budgeting for remaining claims (.3); exchanged emails with colleagues and defense counsel re mediation strategy and logistics (1.1); exchanged emails with carrier representative and JAMS (.3).	1300	2.50	1,450.00
01/24/11	C.H. Rosenberg	Reviewed Mazzolin Claim correspondence (.10); reviewed Parker Claim correspondence from Chartis (.10); reviewed Liberty's letter on Balles (.10); reviewed XL's 1/24/11 correspondence (.10); reviewed XL Specialty's correspondence on Booth, Fuld, Eosterin, O'Meara and various other matters (.30); reviewed K. Melvin's communication on agenda for conference call (.10); reviewed communication from defense counsel and M. Solinger (.10) communication with M. Hersh on strategy (.10); reviewed proposed draft reply and comments (.20); reviewed additional XL correspondence from M. Armstrong (.20); reviewed communication on meeting with carriers regarding mediation issues (.20); reviewed communication from K. Melvin on meeting (.10); reviewed correspondence from Hartford on	1300	2.60	1,885.00



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Date	Timekeeper	Description	Task	Hours	Amount
		private equity policy (.10); reviewed communication with D. Brew (Marsh) (.10); reviewed ACE USA correspondence on Parker (.10); reviewed Allied World's letter (.10); reviewed Chubb's letters (.20); communication with M. Hersh on draft letters (.10); communication with M. Solinger and defense counsel on a meeting (.10); communication with M. Hersh (.10).			
01/24/11	A.J. Moss	Reviewed numerous email messages from M. Solinger, defense counsel, carrier representatives and M. Hersh regarding proposed meetings with carriers and mediation issues (.3); reviewed coverage correspondence recently received from Marsh (.2).	1300	0.50	250.00
01/24/11	J.A.C. Gross	Responded to M. Hersh request for ACE correspondence (.3); organized carrier correspondence (.5).	1300	0.80	200.00
01/24/11	E.A. Arundel	Review compensation procedures and prepare update for C. Rosenberg and A. Moss.	4600	0.20	48.00
01/25/11	M.S. Hersh	Exchanged email with colleagues, client re mediation strategy and logistics (1.5); prepare for telephone conference with carriers (.2); telephone conference with carriers re opt- out mediation (.5); reviewed recent claims correspondence (.4); reviewed JAMS confidentiality agreement (.1); reviewed defense counsel memo	1300	2.90	1,682.00





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Date	Timekeeper	Description	Task	Hours	Amount
		re opt-out and other cases (.2).			
01/25/11	C.H. Rosenberg	Communication with M. Solinger, defense counsel and M. Hersh on mediation issues (.30); reviewed and replied to communication from K. Melvin (CNA/HCC) (.20); reviewed correspondence from M. Armstrong from Chartis on Mazzolin (.30); reviewed ACE's letter on Lavin (.10); reviewed Non-40 Act correspondence from ACE (.10); reviewed Traveler's correspondence (.10); reviewed Freedom Speciality's letter (.10); reviewed AWAC's 1/17/11 and 1/19/11 letters (.10); conference with carriers and defense counsel on mediation issues (.50); follow-up communication with defense counsel on mediation issues (.20); communication with M. Hersh and A. Moss on carrier meetings and mediation (.20); communication with M. Solinger on mediation issues with mediator (.10); reviewed draft mediation statement (.30); communication with M. Solinger on meeting with carriers (.10); communication with M. Hersh on mediation (.10); reviewed communication from mediator (.10).	1300	2.90	2,102.50
01/25/11	A.J. Moss	Communications with M. Hersh to prepare for call with carriers (.1); reviewed email from K. Melvin (HCC/CNA) regarding same (.1); teleconference with client representatives, defense counsel, carrier representatives, M. Hersh and C. Rosenberg to discuss	1300	1.40	700.00



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Date	Timekeeper	Description	Task	Hours	Amount
		mediation and underlying Claims (.5); communications with C. Rosenberg and M. Hersh regarding meeting with carriers (.2); reviewed recently received coverage correspondence from Chartis regarding E&O claims (.2); reviewed recently received coverage correspondence from XL regarding D&O claims (.1); reviewed email from client representatives and defense counsel regarding mediation logistics (.2).			
01/25/11	J.A.C. Gross	Organized carrier correspondence in order to track claim information.	1300	1.00	250.00
01/26/11	M.S. Hersh	Exchanged emails with colleagues, mediator and carrier counsel re mediation and strategy preparation (1.5); worked on setting up with carrier re SASCO issue (.7); reviewed draft opt-out mediation submission (.3).	1300	2.50	1,450.00
01/26/11	C.H. Rosenberg	Reviewed communication from K. Melvin (CNA/HCC) and M. Hersh (.10); communication with M. Hersh on mediation issue (.10); worked on mediation calls and meetings (.30); communication with J. Melnick (JAMS) (.10); reviewed communication with defense counsel and M. Solinger (.10); reviewed preparatory issues for conference call with carriers (.20); reviewed communication on mediation brief (.10); communication with M. Hersh on strategy (.20); reviewed communication from M. Solinger (.10); communication with K.	1300	1.30	942.50



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Date	Timekeeper	Description	Task	Hours	Amount
		Melvin (.10).			
01/26/11	A.J. Moss	Reviewed substantive email from mediator and colleagues regarding SASCo issues.	1300	0.20	100.00
01/27/11	M.S. Hersh	Prepared for telephone conference with carriers, mediator re SASCO issue (.4); exchanged emails with client, defense counsel re same (.4).	1300	0.80	464.00
01/27/11	C.H. Rosenberg	Reviewed communication with defense counsel on mediation (.10); reviewed communication on invoices and XL letter (.10); reviewed and responded to communication with J. Melnick (JAMS) (.10); reviewed communication from K. Melvin (CNA/HCC) on conference call (.10); communication with M. Hersh and K. Melvin on rescheduling options (.10); reviewed communication with M. Solinger and J. Melnick (.10); reviewed communication with carriers (.10).	1300	0.70	507.50
01/27/11	C.H. Rosenberg	Reviewed and supplemented monthly fee application (.50); communication with A. Moss (.10); communication with A. Arundel (.10).	4600	0.70	507.50
01/27/11	E.A. Arundel	Review and revise monthly fee statement and prepare for filing.	4600	0.80	192.00
01/28/11	M.S. Hersh	Reviewed opt-out mediation submissions (.5); prepared for opt-out mediation (.7); prepared for telephone conference with carries, mediation re SASCO issue (.5).	1300	1.70	986.00



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Date	Timekeeper	Description	Task	Hours	Amount
01/28/11	C.H. Rosenberg	Reviewed draft fee statement (.30); reviewed revised draft and invoice attachments (.20); communication with A. Moss (.10); reviewed final draft and attachments (.30); communication with A. Moss on final version (.10).	4600	1.00	725.00
01/28/11	C.H. Rosenberg	Communication with K. Melvin (CNA/HCC) (.10); reviewed correspondence from Fuld from M. Armstrong (.10); reviewed communication on mediation statement from defense counsel (.10); conference call with J. Melnick (JAMS), defense counsel and carrier representatives (.50); reviewed follow-up communication to K. Melvin (.10); reviewed additional mediation statement (.10).	1300	1.00	725.00
01/28/11	A.J. Moss	Communications with J.A. Conway Gross regarding schedule of claims (.2); reviewed same in preparation for budgetary meeting with client and carrier representatives (.3); reviewed two mediation submissions from municipal opt-out parties (1.2).	1300	1.70	850.00
01/28/11	A.J. Moss	Worked on and finalized monthly statement (.9); worked on review of billing and disbursement entries for conformity with court orders and fee committee billing guidelines (.5).	4600	1.40	700.00
01/28/11	J.A.C. Gross	Conferred with A. Moss on upcoming carrier meeting (.30); reworked charts to create masterchart tracking all information and correspondence	1300	5.50	1,375.00



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Date	Timekeeper	Description	Task	Hours	Amount
		relating to each claim (5.20)			
01/29/11	C.H. Rosenberg	Communication with M. Solinger on meeting pre-mediation.	1300	0.10	72.50
01/31/11	C.H. Rosenberg	Reviewed opt-out mediation draft statements (.20); communication with A. Moss on meeting in New York with counsel (.10); reviewed communication with defense counsel and M. Solinger (.10); reviewed M. Armstrong's communication on U.S. Specialty correspondence regarding Weisenech (.10); reviewed HCC communication regarding McDade (.10); reviewed Corcona correspondence (.10); reviewed Butler correspondence (.10); reviewed additional U.S. Specialty communication (.30); reviewed Travelers letter regarding Miron and Angiolitto (.10); reviewed CNA's letter regarding independent directions (.10); reviewed D. Brew's (Marsh) communication on Essex (.10); reviewed correspondence on K. Amin and Kelly matters (.10); reviewed HCC's letters regarding Bernard and Umezka (.10); reviewed client's communication (.10).	1300	1.70	1,232.50
01/31/11	C.H. Rosenberg	Reviewed communication regarding monthly fee submission.	4600	0.20	145.00
01/31/11	A.J. Moss	Reviewed correspondence from HCC regarding investigations coverage (.2); communications with M. Solinger and defense counsel regarding budgetary meeting with carriers (.1);	1300	0.80	400.00



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Date	Timekeeper	Description	Task	Hours	Amount
		reviewed California municipal parties' mediation statement (.5).			
01/31/11	J.A.C. Gross	Updated master claim tracking chart.	1300	0.30	75.00
01/31/11	E.A. Arundel	Review unpaid invoices and confirm holdback amount.	4600	0.30	72.00
<b>Total Fees</b>				<b>138.20</b>	<b>\$76,770.00</b>

#### SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Title		Total
A.J. Moss	Partner	30.10 hrs @ \$ 500.00 / hr	15,050.00
C.H. Rosenberg	Partner	38.80 hrs @ \$ 725.00 / hr	28,130.00
E.A. Arundel	Paralegal	3 hrs @ \$ 240.00 / hr	720.00
J.A.C. Gross	Paralegal	16.20 hrs @ \$ 250.00 / hr	4,050.00
L.J. Raines	Associate	1.70 hrs @ \$ 440.00 / hr	748.00
M.S. Hersh	Partner	48.40 hrs @ \$ 580.00 / hr	28,072.00
<b>Total Professional Services</b>			<b>\$76,770.00</b>

#### DISBURSEMENTS (COSTS ADVANCED AND EXPENSES INCURRED)

Date	Description	Amount
01/31/2011	Westlaw	123.86
11/30/2010	Telephone - Outside Global Crossing Inv No: 9033033973 - HERSH, MARK	20.88
<b>Current Costs and Expenses</b>		<b>\$144.74</b>

#### INVOICE SUMMARY

Total Fees \$ 76,770.00



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Disbursements \$ 144.74

**TOTAL CURRENT INVOICE DUE** \$ **76,914.74**

**SUMMARY OF TIME BILLED BY TASK:**

<b>Task Code</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
1300	Insurance Issues	128.60	71,872.50
4600	Firm's Own Billing/Fee Applications	9.60	4,897.50
	<b>Matter Total</b>	<b>138.20</b>	<b>\$76,770.00</b>

~~EXHIBIT C~~  
~~Pg 80 of 118~~

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Lehman Brothers Holdings Inc.  
1271 Avenue of the Americas, 38th Floor  
New York, NY 10020

Invoice Number: **2100595**  
Invoice Date: **3/10/2011**  
Client Number: **330015**  
Matter Number: **00001**

**RE: Chapter 11 Special Insurance Coverage Counsel**

**2/1/2011 – 2/28/2011**

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**INVOICE SUMMARY**

Total Current Fees..... \$ 81,084.50  
  
**Total Due This Invoice: \$ \$81,084.50**

Please Remit to:

**Mail To:**  
Reed Smith LLP  
2672 Paysphere Circle  
Chicago, IL 60674

**Wire Instructions:**  
Bank of America, N.A.  
Chicago, IL  
ABA Number: 0260-0959-3  
Swift Code: BOFAUS3N (International)  
Account #5201742490  
(Please Reference Invoice Number)



~~EXHIBIT C~~  
Pg 81 of 118**ReedSmith**10 South Wacker Drive, 40<sup>th</sup> Floor  
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1271 Avenue of the Americas, 38th Floor  
New York, NY 10020Invoice Number: **2100595**  
Invoice Date: **3/10/2011**  
Client Number: **330015**  
Matter Number: **00001****RE: Chapter 11 Special Insurance Coverage Counsel****DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH February 28, 2011**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Task</b>	<b>Hours</b>	<b>Amount</b>
02/01/11	M.S. Hersh	Reviewed recent correspondence (.3); prepared for opt-out mediation (.6); met with colleagues re preparation for "budgeting" meeting with carrier representatives (.5); drafted email to client, defense counsel re "budgeting" meeting (.3); worked on document organization issues (.2).	1300	1.90	1,102.00
02/01/11	C.H. Rosenberg	Met with M. Hersh and A. Moss to prepare for call with defense counsel and carriers (.5); reviewed proposed draft documents (.2); reviewed final version of preparatory agenda (.1); reviewed communications from carriers on meeting (.3); reviewed XL's 1/31/11 letter regarding MLP Opportunity (.1); reviewed correspondence regarding Cambium (.1); reviewed XL correspondence regarding Robinson (.1); reviewed communication from M. Armstrong on Stitchting (.1); reviewed mediation statement for opt-out mediation (.2); reviewed Wiley Rein's 2/1/11 letter (.1); reviewed correspondence on Tarrio, McCarthy, et al. (.1);	1300	2.30	1,667.50



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Date	Timekeeper	Description	Task	Hours	Amount
		reviewed Zurich's letter on Parker (.1); reviewed multiple letters on 12 matters forwarded by M. Armstrong (.2); reviewed K. Melvin's (CNN/HCC) communication on meeting (.1).			
02/01/11	J.A.C. Gross	Conferred with A. Moss (.2); continued updating claims tracking chart (.3).	1300	0.50	125.00
02/02/11	M.S. Hersh	Participated on telephone conference with client, defense counsel and carriers re "budget" for covering claims (1.8); telephone conference with E. Albert re American Eagle mediation (2.).	1300	2.00	1,160.00
02/02/11	C.H. Rosenberg	Reviewed additional mediation statements (.30); conference call with defense counsel and carriers on mediation issues (1.70); reviewed correspondence from XL and Marsh (.20); reviewed follow-up communication from M. Hersh (.10).	1300	2.30	1,667.50
02/02/11	A.J. Moss	Communications with C. Rosenberg and M. Hersh (.1); teleconference with M. Solinger, defense counsel, C. Rosenberg, M. Hersh and carrier representatives (1.8); reviewed email from E. Albert regarding American Eagle ARS Claim mediation and communications with M. Hersh regarding same (.1); reviewed voicemail from T. Fishman (Fuld) (.1); telephone call with same (.2); reviewed documents from same (.2).	1300	2.50	1,250.00
02/03/11	M.S. Hersh	Traveled to San Francisco for opt-out mediation (50% travel	1300	4.50	2,610.00



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Date	Timekeeper	Description	Task	Hours	Amount
		time billed) (2.6); prepared for opt-out mediation (1.9).			
02/03/11	C.H. Rosenberg	Reviewed 1/28/11 letter on Fuld from M. Armstrong (.1); communication with A. Moss on Fuld (.1); communication with M. Hersh on mediation (.1).	1300	0.30	217.50
02/03/11	A.J. Moss	Communications with T. Fishman (.1); reviewed recent coverage correspondence from Marsh (.2); communications with J.A. Conway Gross regarding claim materials for NY Tax proceedings against former LBI officers (.2).	1300	0.50	250.00
02/03/11	J.A.C. Gross	Updated comprehensive claims tracking chart by combining my updated information with Marsh chart (4.2); obtained letters requested by A. Moss (.2).	1300	4.40	1,100.00
02/04/11	M.S. Hersh	Attended opt-out mediation.	1300	7.00	4,060.00
02/04/11	C.H. Rosenberg	Reviewed carrier notice on Non-40 Act claim (Pulsar) forwarded by M. Armstrong (.2); reviewed the proposed updated communication from K. Melvin (HCC/CNA) (.1); reviewed further communication on mediations (.1); reviewed mediation statement (.2); reviewed pleading from D. Brew (Marsh) (.2); communication with M. Hersh on update on mediation and next steps (.2).	1300	1.00	725.00
02/04/11	A.J. Moss	Researched NY statutes and cases interpreting same with respect to NYS Tax Proceedings against former LBI officers (.8); reviewed recent coverage correspondence received from	1300	1.00	500.00



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		Marsh (.1); communications with M. Yoshida (JAMS) regarding opt-out mediation (.1).			
02/04/11	J.A.C. Gross	Organized carrier correspondence and emails sent from Marsh for attorney review and retrieval (3.8); updated claims tracking chart (1.1).	1300	4.90	1,225.00
02/05/11	A.J. Moss	Worked on January 2011 fee invoice statements for consistency with court and fee committee rules.	4600	1.00	500.00
02/05/11	A.J. Moss	Reviewed correspondence from XL regarding NY State tax assessment proceedings against former officers (.3); reviewed and analyzed statutory and case law research regarding underlying Claim (.6); reviewed proposed response to XL (.2); analyzed coverage issues (.4).	1300	1.50	750.00
02/06/11	C.H. Rosenberg	Communication with M. Hersh on opt-out mediation developments.	1300	0.10	72.50
02/07/11	M.S. Hersh	Attended "opt-out" mediation (5.5); traveled back to Chicago after mediation (50% travel time billed) (3.1).	1300	8.60	4,988.00
02/07/11	C.H. Rosenberg	Communication with A. Arundel on monthly fee submission (.1); reviewed January invoice for submission (.3); communication with A. Moss on revisions (.1).	4600	0.50	362.50
02/07/11	C.H. Rosenberg	Reviewed communication on Pulsar matter from M. Armstrong (Marsh) (.1); reviewed D&O correspondence from XL (.1); reviewed communication on confidentiality agreement (.1); communication with A. Moss on	1300	1.00	725.00



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Date	Timekeeper	Description	Task	Hours	Amount
		materials for Federal (.1); reviewed communication on Fuld and NYS proceeding (.1); communication with A. Moss (.1); reviewed Chubb's letter on Pulsar (.1); reviewed communication from HCC on Pulsar (.1); reviewed M. Hersh's update on mediation (.1).			
02/07/11	A.J. Moss	Reviewed voicemail from T. Fishman (Fuld) regarding NYS Tax assessment against former LBI officers (.1); reviewed draft correspondence to XL regarding same and notes (.2); telephone call with T. Fishman (.2); reviewed final correspondence to XL regarding NYS Tax assessment against former LBI officers (.1); reviewed recent coverage correspondence received from Marsh (.2); reviewed email from M. Hersh regarding Chubb (.1); telephone call to S. Davidson (Chubb) with M. Hersh (.1); communications with S. Davidson (.2); reviewed and finalized modified JAMS confidentiality agreement (.2); communications with S. Davidson regarding same (.1); communications with JAMS representatives (.1); reviewed mediation submissions with respect to debt/equity and MBS class actions (.6); further communications with Chubb representatives regarding same (.4).	1300	2.60	1,300.00
02/07/11	J.A.C. Gross	Reviewed and organized carrier correspondence (2.6); updated	1300	4.50	1,125.00



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Date	Timekeeper	Description	Task	Hours	Amount
		claims tracking chart (.4); conferred with A. Moss regarding project and claim status (.1); reviewed and organized recently filed complaints filed against Lehman Bros. (1.4).			
02/07/11	E.A. Arundel	Reviewed compensation order and prepare memo regarding January fee statement.	4600	0.10	24.00
02/08/11	M.S. Hersh	Met with colleagues to discuss status of opt-out mediation (.5); telephone conference with counsel for Essex (.1).	1300	0.60	348.00
02/08/11	C.H. Rosenberg	Communication with C. Arthur on fee petitions.	4600	0.10	72.50
02/08/11	C.H. Rosenberg	Meeting with M. Hersh and A. Moss in follow-up to opt-out mediations and coverage issues (.5); reviewed carrier correspondence from M. Armstrong (Marsh) (.3).	1300	0.80	580.00
02/08/11	A.J. Moss	Meeting with C. Rosenberg and M. Hersh to discuss mediation strategy and coverage issues (.5); reviewed recently received coverage correspondence from Marsh (.1).	1300	0.60	300.00
02/09/11	M.S. Hersh	Reviewed recent correspondence including letter from XL (.6); worked on issues re ESSEX counsel inquiry (.5); exchanged emails with colleagues re mediation strategy (.2).	1300	1.30	754.00
02/09/11	C.H. Rosenberg	Reviewed recently filed Securities Suit (.3); reviewed M. Hersh's communication with Essex counsel (.1); communication with E. Albert on Essex issues (.1); reviewed M.Hersh's reply to	1300	1.40	1,015.00



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Date	Timekeeper	Description	Task	Hours	Amount
		updated status report (.1); reviewed communication from D. Brew (Marsh) on complaint (.1); reviewed communication from M. Armstrong (Marsh) on Pulsar (.1); reviewed XL's letter to mediator on coverage issues (.2); communication with M. Hersh on XL's letter (.1); communication with M. Solinger on XL's letter (.1); reviewed M. Armstrong's communication on newest suit (.1); communication with M. Hersh on XL's letter (.2).			
02/09/11	A.J. Moss	Reviewed new debt/equity complaint (.5); communications with C. Rosenberg and M. Hersh regarding same (.2); reviewed correspondence from XL regarding relation-back issue (.3); reviewed email from M. Solinger and C. Rosenberg regarding same (.1).	1300	1.10	550.00
02/09/11	J.A.C. Gross	Reviewed and organized latest carrier correspondence.	1300	0.40	100.00
02/10/11	C.H. Rosenberg	Reviewed revised invoices (.2); reviewed draft fee submission (.2); communication with A. Arundel (.1).	4600	0.50	362.50
02/10/11	C.H. Rosenberg	Reviewed Chubb's 2/9/2011 letter (.10); reviewed XL's 2/10/11 letter (.1); reviewed Private Equity Advisers LLC matter in Arch's 2/10/11 letter (.1); reviewed Non- 40 Act Chartis letter (.1); reviewed Zurich's letters on various D&O matters (.3).	1300	0.70	507.50
02/10/11	A.J. Moss	Reviewed recently received coverage correspondence from	1300	0.20	100.00



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		Marsh.			
02/10/11	A.J. Moss	Reviewed draft monthly statement from E. Arundel (.1); communications with C. Rosenberg regarding same (.1).	4600	0.20	100.00
02/10/11	J.A.C. Gross	Organized documents and emails relating to new claim.	1300	0.30	75.00
02/10/11	E.A. Arundel	Prepared monthly fee statement for review of C. Rosenberg.	4600	1.40	336.00
02/11/11	M.S. Hersh	Reviewed recent correspondence (.1); worked on issue re ESSEX mediation (.1).	1300	0.20	116.00
02/11/11	C.H. Rosenberg	Reviewed Lloyd's letters on new complaint (.1); reviewed AXIS's letter on Fuld (.1); reviewed Allied World letter (.1); reviewed Parker letter (.1); reviewed G. Dixon's (XL) communication to mediator (.1); communication with M. Hersh on response (.1); communication with M. Solinger and defense counsel (.1).	1300	0.70	507.50
02/11/11	A.J. Moss	Reviewed email from XL representatives (.1); reviewed email from M. Solinger and C. Rosenberg regarding same (.2); reviewed voicemail and email from M. Deifik (Chartis) (.2); communications with M. Hersh regarding same (.2); communications with E. Albert regarding same (.1); communications with M. Deifik (.1).	1300	0.90	450.00
02/14/11	M.S. Hersh	Reviewed "to do" list (.1); teleconference with E. Albert re ESSEX mediation (.3); exchanged emails re ESSEX mediation (.2); reviewed emails	1300	0.80	464.00





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Date	Timekeeper	Description	Task	Hours	Amount
		and client re: agreements (.2).			
02/14/11	C.H. Rosenberg	Reviewed Lavin correspondence (.1); reviewed communication with J. Melnick (JAMS) and counsel on mediation (.1); communication with M. Hersh (.1); reviewed HCC's letter on Utz (.1); communication with E. Albert (.1); reviewed communication with mediators (.2); communication with K. Melvin (CNA/HCC) and M. Solinger on mediation issues (.1); reviewed Chartis's letter on Robb (.1); reviewed Chartis's 2/14/11 Parker letter (.1); reviewed defense counsel's submission on offerings (.2).	1300	1.20	870.00
02/14/11	C.H. Rosenberg	Reviewed draft fee submission (.3); conference with A. Arundel on revisions (.1); finalized submission and exhibits (.3).	4600	0.70	507.50
02/14/11	A.J. Moss	Reviewed recently received coverage correspondence from Marsh (.2); reviewed email from E. Albert and M. Hersh regarding Essex mediation (.2); communications with M. Deifik (Chartis) regarding Essex mediation (.3).	1300	0.70	350.00
02/14/11	A.J. Moss	Final review and edits to monthly statement.	4600	0.20	100.00
02/15/11	C.H. Rosenberg	Reviewed communication from D. Brew (Marsh) on D&O matters (.2); reviewed Mazzolin letter (.10); reviewed K. Melvin's (CNA/HCC) communication on mediation (.1); reviewed Chartis's letter on McReynolds (.1); reviewed 10 non-40 Act letters	1300	0.90	652.50



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		from carriers (.3); communication with M. Solinger on mediation (.1).			
02/15/11	A.J. Moss	Reviewed email from mediator regarding Essex mediation (.1); communications with M. Hersh regarding same (.1); reviewed recently received coverage correspondence from Marsh (.2).	1300	0.40	200.00
02/16/11	M.S. Hersh	Exchanged emails with colleagues re: mediation preparation.	1300	0.30	174.00
02/16/11	C.H. Rosenberg	Reviewed VCAP letters from XL (.1); communication with defense counsel on mediation preparation conference call and agenda items (.2); reviewed D&O letters on Non-40 Act claims (.1); communication with defense counsel on mediation (.1); reviewed draft SASCo mediation submission (.3); reviewed communication from M. Solinger (.1).	1300	0.90	652.50
02/16/11	A.J. Moss	Reviewed recently received coverage correspondence from Marsh (.2); communications with E. Albert and M. Hersh regarding Essex mediation (.2); communications with M. Deifik and C. Chiovetta (Chartis) regarding Essex mediation (.2).	1300	0.60	300.00
02/16/11	J.A.C. Gross	Organized latest correspondence from carriers.	1300	1.80	450.00
02/17/11	M.S. Hersh	Reviewed emails re mediation preparation.	1300	0.20	116.00
02/17/11	C.H. Rosenberg	Communication with D. Brew (Marsh) on mediation (.1); communication with M. Solinger	1300	1.00	725.00



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Date	Timekeeper	Description	Task	Hours	Amount
		on mediation (.1); reviewed materials for mediation (.1); communication with M. Hersh on strategy (.2); reviewed E. Albert's communication on mediation (.1); reviewed M. Solinger's comments on submission (.1); reviewed defense counsel's reply (.1); reviewed communication with J. Melnick (JAMS) (.1); communication with defense counsel regarding preparation for mediation (.1).			
02/17/11	A.J. Moss	Communications with client representatives and defense counsel regarding preparation for mediation (.2); reviewed email from E. Albert (.1); communications with M. Hersh regarding same (.1); reviewed draft supplemental mediation submission for SASCo action (.4).	1300	0.80	400.00
02/17/11	J.A.C. Gross	Organized carrier correspondence (2.2) and updated claims tracking chart with quick notes from coverage letters (1.4).	1300	3.60	900.00
02/18/11	M.S. Hersh	Reviewed recent emails (.3); prepared for teleconferences with client and mediator (.7); analyzed issues raised by ESSEX plaintiffs (1.1); teleconferences with client and mediator to prepare for mediation (.7); prepared for mediation (.7); exchanged emails with colleagues re mediation strategy (.4); reviewed supplemental mediation brief re SASCo (.2).	1300	4.10	2,378.00
02/18/11	C.H.	Reviewed mediator's	1300	2.50	1,812.50



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Date	Timekeeper	Description	Task	Hours	Amount
	Rosenberg	communication on mediation issues (.1); communication with M. Solinger on coverage issues (.1); reviewed defense counsel's communication on requested documents (.3); communication with A. Moss and M. Hersh on coverage research (.2); conference call with defense counsel to prepare for call with mediators (.3); conference call with mediators and defense counsel (.5); follow-up communication with M. Hersh on strategic issues (.2); reviewed communication from defense counsel on mediation issue (.10); communication with M. Hersh on coverage analysis (.2); reviewed supplemental SASCo mediation submission (.2); communication with defense counsel on mediation preparation (.2); communication with M. Solinger (.1).			
02/18/11	A.J. Moss	Reviewed email from mediator regarding Essex mediation (.2); communications with M. Hersh and C. Rosenberg regarding same (.2); teleconference with M. Solinger, E. Albert, defense counsel, C. Rosenberg and M. Hersh to discuss mediation logistics and coverage issues (.4); meeting with C. Rosenberg and M. Hersh (.1); teleconference with client representatives, defense counsel, mediators, C. Rosenberg and M. Hersh to discuss mediation (.5); meeting with M. Hersh to discuss coverage issues and research	1300	1.60	800.00



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		(.2); reviewed and analyzed cases on various coverage issues (.5).			
02/18/11	J.A.C. Gross	Reviewed and organized emails of carrier correspondence from Marsh (1.2); reviewed and analyzed carrier coverage position correspondence files (1.8).	1300	3.00	750.00
02/19/11	A.J. Moss	Reviewed and analyzed research on various coverage issues in preparation for mediation.	1300	0.50	250.00
02/20/11	C.H. Rosenberg	Communication with defense counsel on mediation issues.	1300	0.10	72.50
02/21/11	M.S. Hersh	Prepared for mediation (2.8); traveled to NY for mediation (50% travel time billed) (1.5).	1300	4.30	2,494.00
02/21/11	C.H. Rosenberg	Reviewed communication with defense counsel and carriers on Rule 23(f) filings (.2); reviewed briefing forwarded by defense counsel (.2); traveled to New York for mediation (50% travel time billed) (1.5); prepared for mediation (2.5); reviewed analysis and research on mediation issue from A. Moss (.2); communication with A. Moss and M. Hersh on mediation analysis and issues (.3).	1300	4.90	3,552.50
02/21/11	A.J. Moss	Researched, reviewed and analyzed cases and materials on coverage issues (2.3); worked on substantive email to C. Rosenberg and M. Hersh regarding same (.4); communications with C. Rosenberg and M. Hersh (.5); further researched, reviewed and	1300	4.90	2,450.00



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		analyzed various coverage issues (.7); further communications with M. Hersh (.2); reviewed supplemental mediation submission from defendants in SASCo litigation (.4); reviewed correspondence from E. McGarry and K. Melvin (CNA/HCC) (.3); communications with J.A. Conway Gross (.1).			
02/21/11	J.A.C. Gross	Organized carrier correspondence.	1300	0.60	150.00
02/22/11	M.S. Hersh	Prepared for mediation (.6); attended mediation (7.6).	1300	8.20	4,756.00
02/22/11	C.H. Rosenberg	Preparatory meetings with M. Solinger and defense counsel for mediation (.5); attended all day mediation with carriers, defense counsel and mediators (8.0); reviewed communications from Marsh on carrier correspondence and pleadings (.3); strategy meeting with M. Hersh (.3); updated A. Moss and reviewed research (.1).	1300	9.20	6,670.00
02/22/11	A.J. Moss	Reviewed email from C. Rosenberg regarding status of mediation (.1); reviewed recently received coverage correspondence from various carriers (.2).	1300	0.30	150.00
02/23/11	M.S. Hersh	Attended mediation (6.8); traveled back to Chicago (50% travel time billed) (2.9).	1300	9.70	5,626.00
02/23/11	C.H. Rosenberg	Reviewed draft communication from K. Melvin (.1); review document for mediation (.1); communication with M. Hersh and defense counsel on	1300	11.00	7,975.00



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Date	Timekeeper	Description	Task	Hours	Amount
		proposed materials (.3); attended and participated in second day of mediation and follow-up (7.5); return travel to Chicago and work en route to review correspondence from carriers and M. Armstrong (Marsh) (3.00-50% travel time).			
02/23/11	A.J. Moss	Communications with C. Rosenberg regarding debt/equity and SASCo mediation issues (.2); reviewed recently received coverage correspondence from Marsh (.1).	1300	0.30	150.00
02/24/11	M.S. Hersh	Reviewed recent emails (.1); organized files (.1).	1300	0.20	116.00
02/24/11	C.H. Rosenberg	Review communication from M. Armstrong on amended complaint (.10).	1300	0.10	72.50
02/25/11	C.H. Rosenberg	Reviewed ERISA class action related correspondence from M. Armstrong (Marsh).	1300	0.10	72.50
02/27/11	C.H. Rosenberg	Communicate with M. Solinger on Marsh mediation date (.10); communicate with M. Hersh on agenda and strategy (.10).	1300	0.20	145.00
<b>Total Fees</b>				<b>146.30</b>	<b>\$81,084.50</b>

#### SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Title		Total
A.J. Moss	Partner	22.40 hrs @ \$ 500.00 / hr	11,200.00
C.H. Rosenberg	Partner	44.50 hrs @ \$ 725.00 / hr	32,262.50
E.A. Arundel	Paralegal	1.50 hrs @ \$ 240.00 / hr	360.00



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J.A.C. Gross	Paralegal	24 hrs @ \$ 250.00 / hr	6,000.00
M.S. Hersh	Partner	53.90 hrs @ \$ 580.00 / hr	31,262.00
<b>Total Professional Services</b>			<b>\$81,084.50</b>

#### INVOICE SUMMARY

Total Fees \$ 81,084.50

**TOTAL CURRENT INVOICE DUE \$ 81,084.50**

#### SUMMARY OF TIME BILLED BY TASK:

Task Code	Description	Hours	Amount
1300	Insurance Issues	141.60	78,719.50
4600	Firm's Own Billing/Fee Applications	4.70	2,365.00
	<b>Matter Total</b>	<b>146.30</b>	<b>\$81,084.50</b>



~~EXHIBIT C~~  
Pg 97 of 118**ReedSmith**10 South Wacker Drive, 40<sup>th</sup> Floor  
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1271 Avenue of the Americas, 38th Floor  
New York, NY 10020Invoice Number: **2100595**  
Invoice Date: **3/10/2011**  
Client Number: **330015**  
Matter Number: **00001****RE: Chapter 11 Special Insurance Coverage Counsel****DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH February 28, 2011**

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Task</b>	<b>Hours</b>	<b>Amount</b>
02/01/11	M.S. Hersh	Reviewed recent correspondence (.3); prepared for opt-out mediation (.6); met with colleagues re preparation for "budgeting" meeting with carrier representatives (.5); drafted email to client, defense counsel re "budgeting" meeting (.3); worked on document organization issues (.2).	1300	1.90	1,102.00
02/01/11	C.H. Rosenberg	Met with M. Hersh and A. Moss to prepare for call with defense counsel and carriers (.5); reviewed proposed draft documents (.2); reviewed final version of preparatory agenda (.1); reviewed communications from carriers on meeting (.3); reviewed XL's 1/31/11 letter regarding MLP Opportunity (.1); reviewed correspondence regarding Cambium (.1); reviewed XL correspondence regarding Robinson (.1); reviewed communication from M. Armstrong on Stitchting (.1); reviewed mediation statement for opt-out mediation (.2); reviewed Wiley Rein's 2/1/11 letter (.1); reviewed correspondence on Tarrio, McCarthy, et al. (.1);	1300	2.30	1,667.50



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Date	Timekeeper	Description	Task	Hours	Amount
		reviewed Zurich's letter on Parker (.1); reviewed multiple letters on 12 matters forwarded by M. Armstrong (.2); reviewed K. Melvin's (CNN/HCC) communication on meeting (.1).			
02/01/11	J.A.C. Gross	Conferred with A. Moss (.2); continued updating claims tracking chart (.3).	1300	0.50	125.00
02/02/11	M.S. Hersh	Participated on telephone conference with client, defense counsel and carriers re "budget" for covering claims (1.8); telephone conference with E. Albert re American Eagle mediation (2.).	1300	2.00	1,160.00
02/02/11	C.H. Rosenberg	Reviewed additional mediation statements (.30); conference call with defense counsel and carriers on mediation issues (1.70); reviewed correspondence from XL and Marsh (.20); reviewed follow-up communication from M. Hersh (.10).	1300	2.30	1,667.50
02/02/11	A.J. Moss	Communications with C. Rosenberg and M. Hersh (.1); teleconference with M. Solinger, defense counsel, C. Rosenberg, M. Hersh and carrier representatives (1.8); reviewed email from E. Albert regarding American Eagle ARS Claim mediation and communications with M. Hersh regarding same (.1); reviewed voicemail from T. Fishman (Fuld) (.1); telephone call with same (.2); reviewed documents from same (.2).	1300	2.50	1,250.00
02/03/11	M.S. Hersh	Traveled to San Francisco for opt-out mediation (50% travel	1300	4.50	2,610.00



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Date	Timekeeper	Description	Task	Hours	Amount
		time billed) (2.6); prepared for opt-out mediation (1.9).			
02/03/11	C.H. Rosenberg	Reviewed 1/28/11 letter on Fuld from M. Armstrong (.1); communication with A. Moss on Fuld (.1); communication with M. Hersh on mediation (.1).	1300	0.30	217.50
02/03/11	A.J. Moss	Communications with T. Fishman (.1); reviewed recent coverage correspondence from Marsh (.2); communications with J.A. Conway Gross regarding claim materials for NY Tax proceedings against former LBI officers (.2).	1300	0.50	250.00
02/03/11	J.A.C. Gross	Updated comprehensive claims tracking chart by combining my updated information with Marsh chart (4.2); obtained letters requested by A. Moss (.2).	1300	4.40	1,100.00
02/04/11	M.S. Hersh	Attended opt-out mediation.	1300	7.00	4,060.00
02/04/11	C.H. Rosenberg	Reviewed carrier notice on Non-40 Act claim (Pulsar) forwarded by M. Armstrong (.2); reviewed the proposed updated communication from K. Melvin (HCC/CNA) (.1); reviewed further communication on mediations (.1); reviewed mediation statement (.2); reviewed pleading from D. Brew (Marsh) (.2); communication with M. Hersh on update on mediation and next steps (.2).	1300	1.00	725.00
02/04/11	A.J. Moss	Researched NY statutes and cases interpreting same with respect to NYS Tax Proceedings against former LBI officers (.8); reviewed recent coverage correspondence received from	1300	1.00	500.00



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Date	Timekeeper	Description	Task	Hours	Amount
		Marsh (.1); communications with M. Yoshida (JAMS) regarding opt-out mediation (.1).			
02/04/11	J.A.C. Gross	Organized carrier correspondence and emails sent from Marsh for attorney review and retrieval (3.8); updated claims tracking chart (1.1).	1300	4.90	1,225.00
02/05/11	A.J. Moss	Worked on January 2011 fee invoice statements for consistency with court and fee committee rules.	4600	1.00	500.00
02/05/11	A.J. Moss	Reviewed correspondence from XL regarding NY State tax assessment proceedings against former officers (.3); reviewed and analyzed statutory and case law research regarding underlying Claim (.6); reviewed proposed response to XL (.2); analyzed coverage issues (.4).	1300	1.50	750.00
02/06/11	C.H. Rosenberg	Communication with M. Hersh on opt-out mediation developments.	1300	0.10	72.50
02/07/11	M.S. Hersh	Attended "opt-out" mediation (5.5); traveled back to Chicago after mediation (50% travel time billed) (3.1).	1300	8.60	4,988.00
02/07/11	C.H. Rosenberg	Communication with A. Arundel on monthly fee submission (.1); reviewed January invoice for submission (.3); communication with A. Moss on revisions (.1).	4600	0.50	362.50
02/07/11	C.H. Rosenberg	Reviewed communication on Pulsar matter from M. Armstrong (Marsh) (.1); reviewed D&O correspondence from XL (.1); reviewed communication on confidentiality agreement (.1); communication with A. Moss on	1300	1.00	725.00



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Date	Timekeeper	Description	Task	Hours	Amount
		materials for Federal (.1); reviewed communication on Fuld and NYS proceeding (.1); communication with A. Moss (.1); reviewed Chubb's letter on Pulsar (.1); reviewed communication from HCC on Pulsar (.1); reviewed M. Hersh's update on mediation (.1).			
02/07/11	A.J. Moss	Reviewed voicemail from T. Fishman (Fuld) regarding NYS Tax assessment against former LBI officers (.1); reviewed draft correspondence to XL regarding same and notes (.2); telephone call with T. Fishman (.2); reviewed final correspondence to XL regarding NYS Tax assessment against former LBI officers (.1); reviewed recent coverage correspondence received from Marsh (.2); reviewed email from M. Hersh regarding Chubb (.1); telephone call to S. Davidson (Chubb) with M. Hersh (.1); communications with S. Davidson (.2); reviewed and finalized modified JAMS confidentiality agreement (.2); communications with S. Davidson regarding same (.1); communications with JAMS representatives (.1); reviewed mediation submissions with respect to debt/equity and MBS class actions (.6); further communications with Chubb representatives regarding same (.4).	1300	2.60	1,300.00
02/07/11	J.A.C. Gross	Reviewed and organized carrier correspondence (2.6); updated	1300	4.50	1,125.00



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Date	Timekeeper	Description	Task	Hours	Amount
		claims tracking chart (.4); conferred with A. Moss regarding project and claim status (.1); reviewed and organized recently filed complaints filed against Lehman Bros. (1.4).			
02/07/11	E.A. Arundel	Reviewed compensation order and prepare memo regarding January fee statement.	4600	0.10	24.00
02/08/11	M.S. Hersh	Met with colleagues to discuss status of opt-out mediation (.5); telephone conference with counsel for Essex (.1).	1300	0.60	348.00
02/08/11	C.H. Rosenberg	Communication with C. Arthur on fee petitions.	4600	0.10	72.50
02/08/11	C.H. Rosenberg	Meeting with M. Hersh and A. Moss in follow-up to opt-out mediations and coverage issues (.5); reviewed carrier correspondence from M. Armstrong (Marsh) (.3).	1300	0.80	580.00
02/08/11	A.J. Moss	Meeting with C. Rosenberg and M. Hersh to discuss mediation strategy and coverage issues (.5); reviewed recently received coverage correspondence from Marsh (.1).	1300	0.60	300.00
02/09/11	M.S. Hersh	Reviewed recent correspondence including letter from XL (.6); worked on issues re ESSEX counsel inquiry (.5); exchanged emails with colleagues re mediation strategy (.2).	1300	1.30	754.00
02/09/11	C.H. Rosenberg	Reviewed recently filed Securities Suit (.3); reviewed M. Hersh's communication with Essex counsel (.1); communication with E. Albert on Essex issues (.1); reviewed M.Hersh's reply to	1300	1.40	1,015.00



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Date	Timekeeper	Description	Task	Hours	Amount
		updated status report (.1); reviewed communication from D. Brew (Marsh) on complaint (.1); reviewed communication from M. Armstrong (Marsh) on Pulsar (.1); reviewed XL's letter to mediator on coverage issues (.2); communication with M. Hersh on XL's letter (.1); communication with M. Solinger on XL's letter (.1); reviewed M. Armstrong's communication on newest suit (.1); communication with M. Hersh on XL's letter (.2).			
02/09/11	A.J. Moss	Reviewed new debt/equity complaint (.5); communications with C. Rosenberg and M. Hersh regarding same (.2); reviewed correspondence from XL regarding relation-back issue (.3); reviewed email from M. Solinger and C. Rosenberg regarding same (.1).	1300	1.10	550.00
02/09/11	J.A.C. Gross	Reviewed and organized latest carrier correspondence.	1300	0.40	100.00
02/10/11	C.H. Rosenberg	Reviewed revised invoices (.2); reviewed draft fee submission (.2); communication with A. Arundel (.1).	4600	0.50	362.50
02/10/11	C.H. Rosenberg	Reviewed Chubb's 2/9/2011 letter (.10); reviewed XL's 2/10/11 letter (.1); reviewed Private Equity Advisers LLC matter in Arch's 2/10/11 letter (.1); reviewed Non- 40 Act Chartis letter (.1); reviewed Zurich's letters on various D&O matters (.3).	1300	0.70	507.50
02/10/11	A.J. Moss	Reviewed recently received coverage correspondence from	1300	0.20	100.00



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Date	Timekeeper	Description	Task	Hours	Amount
		Marsh.			
02/10/11	A.J. Moss	Reviewed draft monthly statement from E. Arundel (.1); communications with C. Rosenberg regarding same (.1).	4600	0.20	100.00
02/10/11	J.A.C. Gross	Organized documents and emails relating to new claim.	1300	0.30	75.00
02/10/11	E.A. Arundel	Prepared monthly fee statement for review of C. Rosenberg.	4600	1.40	336.00
02/11/11	M.S. Hersh	Reviewed recent correspondence (.1); worked on issue re ESSEX mediation (.1).	1300	0.20	116.00
02/11/11	C.H. Rosenberg	Reviewed Lloyd's letters on new complaint (.1); reviewed AXIS's letter on Fuld (.1); reviewed Allied World letter (.1); reviewed Parker letter (.1); reviewed G. Dixon's (XL) communication to mediator (.1); communication with M. Hersh on response (.1); communication with M. Solinger and defense counsel (.1).	1300	0.70	507.50
02/11/11	A.J. Moss	Reviewed email from XL representatives (.1); reviewed email from M. Solinger and C. Rosenberg regarding same (.2); reviewed voicemail and email from M. Deifik (Chartis) (.2); communications with M. Hersh regarding same (.2); communications with E. Albert regarding same (.1); communications with M. Deifik (.1).	1300	0.90	450.00
02/14/11	M.S. Hersh	Reviewed "to do" list (.1); teleconference with E. Albert re ESSEX mediation (.3); exchanged emails re ESSEX mediation (.2); reviewed emails	1300	0.80	464.00





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Date	Timekeeper	Description	Task	Hours	Amount
		and client re: agreements (.2).			
02/14/11	C.H. Rosenberg	Reviewed Lavin correspondence (.1); reviewed communication with J. Melnick (JAMS) and counsel on mediation (.1); communication with M. Hersh (.1); reviewed HCC's letter on Utz (.1); communication with E. Albert (.1); reviewed communication with mediators (.2); communication with K. Melvin (CNA/HCC) and M. Solinger on mediation issues (.1); reviewed Chartis's letter on Robb (.1); reviewed Chartis's 2/14/11 Parker letter (.1); reviewed defense counsel's submission on offerings (.2).	1300	1.20	870.00
02/14/11	C.H. Rosenberg	Reviewed draft fee submission (.3); conference with A. Arundel on revisions (.1); finalized submission and exhibits (.3).	4600	0.70	507.50
02/14/11	A.J. Moss	Reviewed recently received coverage correspondence from Marsh (.2); reviewed email from E. Albert and M. Hersh regarding Essex mediation (.2); communications with M. Deifik (Chartis) regarding Essex mediation (.3).	1300	0.70	350.00
02/14/11	A.J. Moss	Final review and edits to monthly statement.	4600	0.20	100.00
02/15/11	C.H. Rosenberg	Reviewed communication from D. Brew (Marsh) on D&O matters (.2); reviewed Mazzolin letter (.10); reviewed K. Melvin's (CNA/HCC) communication on mediation (.1); reviewed Chartis's letter on McReynolds (.1); reviewed 10 non-40 Act letters	1300	0.90	652.50



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Date	Timekeeper	Description	Task	Hours	Amount
		from carriers (.3); communication with M. Solinger on mediation (.1).			
02/15/11	A.J. Moss	Reviewed email from mediator regarding Essex mediation (.1); communications with M. Hersh regarding same (.1); reviewed recently received coverage correspondence from Marsh (.2).	1300	0.40	200.00
02/16/11	M.S. Hersh	Exchanged emails with colleagues re: mediation preparation.	1300	0.30	174.00
02/16/11	C.H. Rosenberg	Reviewed VCAP letters from XL (.1); communication with defense counsel on mediation preparation conference call and agenda items (.2); reviewed D&O letters on Non-40 Act claims (.1); communication with defense counsel on mediation (.1); reviewed draft SASCo mediation submission (.3); reviewed communication from M. Solinger (.1).	1300	0.90	652.50
02/16/11	A.J. Moss	Reviewed recently received coverage correspondence from Marsh (.2); communications with E. Albert and M. Hersh regarding Essex mediation (.2); communications with M. Deifik and C. Chiovetta (Chartis) regarding Essex mediation (.2).	1300	0.60	300.00
02/16/11	J.A.C. Gross	Organized latest correspondence from carriers.	1300	1.80	450.00
02/17/11	M.S. Hersh	Reviewed emails re mediation preparation.	1300	0.20	116.00
02/17/11	C.H. Rosenberg	Communication with D. Brew (Marsh) on mediation (.1); communication with M. Solinger	1300	1.00	725.00



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Date	Timekeeper	Description	Task	Hours	Amount
		on mediation (.1); reviewed materials for mediation (.1); communication with M. Hersh on strategy (.2); reviewed E. Albert's communication on mediation (.1); reviewed M. Solinger's comments on submission (.1); reviewed defense counsel's reply (.1); reviewed communication with J. Melnick (JAMS) (.1); communication with defense counsel regarding preparation for mediation (.1).			
02/17/11	A.J. Moss	Communications with client representatives and defense counsel regarding preparation for mediation (.2); reviewed email from E. Albert (.1); communications with M. Hersh regarding same (.1); reviewed draft supplemental mediation submission for SASCo action (.4).	1300	0.80	400.00
02/17/11	J.A.C. Gross	Organized carrier correspondence (2.2) and updated claims tracking chart with quick notes from coverage letters (1.4).	1300	3.60	900.00
02/18/11	M.S. Hersh	Reviewed recent emails (.3); prepared for teleconferences with client and mediator (.7); analyzed issues raised by ESSEX plaintiffs (1.1); teleconferences with client and mediator to prepare for mediation (.7); prepared for mediation (.7); exchanged emails with colleagues re mediation strategy (.4); reviewed supplemental mediation brief re SASCo (.2).	1300	4.10	2,378.00
02/18/11	C.H.	Reviewed mediator's	1300	2.50	1,812.50



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Date	Timekeeper	Description	Task	Hours	Amount
	Rosenberg	communication on mediation issues (.1); communication with M. Solinger on coverage issues (.1); reviewed defense counsel's communication on requested documents (.3); communication with A. Moss and M. Hersh on coverage research (.2); conference call with defense counsel to prepare for call with mediators (.3); conference call with mediators and defense counsel (.5); follow-up communication with M. Hersh on strategic issues (.2); reviewed communication from defense counsel on mediation issue (.10); communication with M. Hersh on coverage analysis (.2); reviewed supplemental SASCo mediation submission (.2); communication with defense counsel on mediation preparation (.2); communication with M. Solinger (.1).			
02/18/11	A.J. Moss	Reviewed email from mediator regarding Essex mediation (.2); communications with M. Hersh and C. Rosenberg regarding same (.2); teleconference with M. Solinger, E. Albert, defense counsel, C. Rosenberg and M. Hersh to discuss mediation logistics and coverage issues (.4); meeting with C. Rosenberg and M. Hersh (.1); teleconference with client representatives, defense counsel, mediators, C. Rosenberg and M. Hersh to discuss mediation (.5); meeting with M. Hersh to discuss coverage issues and research	1300	1.60	800.00



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Date	Timekeeper	Description	Task	Hours	Amount
		(.2); reviewed and analyzed cases on various coverage issues (.5).			
02/18/11	J.A.C. Gross	Reviewed and organized emails of carrier correspondence from Marsh (1.2); reviewed and analyzed carrier coverage position correspondence files (1.8).	1300	3.00	750.00
02/19/11	A.J. Moss	Reviewed and analyzed research on various coverage issues in preparation for mediation.	1300	0.50	250.00
02/20/11	C.H. Rosenberg	Communication with defense counsel on mediation issues.	1300	0.10	72.50
02/21/11	M.S. Hersh	Prepared for mediation (2.8); traveled to NY for mediation (50% travel time billed) (1.5).	1300	4.30	2,494.00
02/21/11	C.H. Rosenberg	Reviewed communication with defense counsel and carriers on Rule 23(f) filings (.2); reviewed briefing forwarded by defense counsel (.2); traveled to New York for mediation (50% travel time billed) (1.5); prepared for mediation (2.5); reviewed analysis and research on mediation issue from A. Moss (.2); communication with A. Moss and M. Hersh on mediation analysis and issues (.3).	1300	4.90	3,552.50
02/21/11	A.J. Moss	Researched, reviewed and analyzed cases and materials on coverage issues (2.3); worked on substantive email to C. Rosenberg and M. Hersh regarding same (.4); communications with C. Rosenberg and M. Hersh (.5); further researched, reviewed and	1300	4.90	2,450.00



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Date	Timekeeper	Description	Task	Hours	Amount
		analyzed various coverage issues (.7); further communications with M. Hersh (.2); reviewed supplemental mediation submission from defendants in SASCo litigation (.4); reviewed correspondence from E. McGarry and K. Melvin (CNA/HCC) (.3); communications with J.A. Conway Gross (.1).			
02/21/11	J.A.C. Gross	Organized carrier correspondence.	1300	0.60	150.00
02/22/11	M.S. Hersh	Prepared for mediation (.6); attended mediation (7.6).	1300	8.20	4,756.00
02/22/11	C.H. Rosenberg	Preparatory meetings with M. Solinger and defense counsel for mediation (.5); attended all day mediation with carriers, defense counsel and mediators (8.0); reviewed communications from Marsh on carrier correspondence and pleadings (.3); strategy meeting with M. Hersh (.3); updated A. Moss and reviewed research (.1).	1300	9.20	6,670.00
02/22/11	A.J. Moss	Reviewed email from C. Rosenberg regarding status of mediation (.1); reviewed recently received coverage correspondence from various carriers (.2).	1300	0.30	150.00
02/23/11	M.S. Hersh	Attended mediation (6.8); traveled back to Chicago (50% travel time billed) (2.9).	1300	9.70	5,626.00
02/23/11	C.H. Rosenberg	Reviewed draft communication from K. Melvin (.1); review document for mediation (.1); communication with M. Hersh and defense counsel on	1300	11.00	7,975.00



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Date	Timekeeper	Description	Task	Hours	Amount
		proposed materials (.3); attended and participated in second day of mediation and follow-up (7.5); return travel to Chicago and work en route to review correspondence from carriers and M. Armstrong (Marsh) (3.00-50% travel time).			
02/23/11	A.J. Moss	Communications with C. Rosenberg regarding debt/equity and SASCo mediation issues (.2); reviewed recently received coverage correspondence from Marsh (.1).	1300	0.30	150.00
02/24/11	M.S. Hersh	Reviewed recent emails (.1); organized files (.1).	1300	0.20	116.00
02/24/11	C.H. Rosenberg	Review communication from M. Armstrong on amended complaint (.10).	1300	0.10	72.50
02/25/11	C.H. Rosenberg	Reviewed ERISA class action related correspondence from M. Armstrong (Marsh).	1300	0.10	72.50
02/27/11	C.H. Rosenberg	Communicate with M. Solinger on Marsh mediation date (.10); communicate with M. Hersh on agenda and strategy (.10).	1300	0.20	145.00
<b>Total Fees</b>				<b>146.30</b>	<b>\$81,084.50</b>

#### SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Title		Total
A.J. Moss	Partner	22.40 hrs @ \$ 500.00 / hr	11,200.00
C.H. Rosenberg	Partner	44.50 hrs @ \$ 725.00 / hr	32,262.50
E.A. Arundel	Paralegal	1.50 hrs @ \$ 240.00 / hr	360.00



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J.A.C. Gross	Paralegal	24 hrs @ \$ 250.00 / hr	6,000.00
M.S. Hersh	Partner	53.90 hrs @ \$ 580.00 / hr	31,262.00
<b>Total Professional Services</b>			<b>\$81,084.50</b>

#### INVOICE SUMMARY

Total Fees \$ 81,084.50

**TOTAL CURRENT INVOICE DUE \$ 81,084.50**

#### SUMMARY OF TIME BILLED BY TASK:

Task Code	Description	Hours	Amount
1300	Insurance Issues	141.60	78,719.50
4600	Firm's Own Billing/Fee Applications	4.70	2,365.00
	<b>Matter Total</b>	<b>146.30</b>	<b>\$81,084.50</b>



## **EXHIBIT D**

Carolyn H. Rosenberg  
REED SMITH LLP  
10 S. Wacker Drive  
Suite 4000  
Chicago, IL 60606  
Telephone: (312) 207-1000  
Facsimile: (312) 207-6400

*Special Counsel for Lehman Brothers Holdings, Inc.  
and its affiliated Debtors and Debtors in Possession*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

-----X	:
In re	: Chapter 11
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: Case No. 08-13555 (JMP)
	:
Debtors	: (Jointly Administered)
	:
-----X	:

**CERTIFICATION OF CAROLYN H. ROSENBERG**

I, Carolyn H. Rosenberg, Esquire, certify as follows:

1. I am a Partner with the applicant firm, Reed Smith LLP ("Reed Smith"), and have been admitted to the Bar of the Supreme Court of Illinois since 1982. Reed Smith has been retained as Special Counsel to the Debtors and Debtors in Possession and has rendered professional services in these Chapter 11 cases.

2. In respect of compliance with the Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases adopted by the Court on June 20, 1991 (the "Fee and Disbursement Guidelines") and the Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases adopted by

the Court on April 19, 1995 (together with the Fee and Disbursement Guidelines, the “Local Guidelines”), the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, adopted on January 30, 1996 (the “U.S. Trustee Guidelines”) and the Second Amended Order Pursuant to Sections 105(a) and 331 of the Bankruptcy Code and Bankruptcy Rule 2016(a) Establishing Procedures for Interim Monthly Compensation and Reimbursement of Expenses of Professionals [Docket No. 3102] (the “Administrative Order,” and together with the Local Guidelines and the U.S. Trustee Guidelines, the “Guidelines”) this certification is made in respect of Reed Smith’s application, dated June 2, 2011 (the “Application”), for interim compensation and reimbursement of expenses for the period commencing December 1, 2010 through and including February 28, 2011 (the “Second Compensation Period”) in accordance with the Guidelines.

3. In respect of section 2 of the Fee and Disbursement Guidelines, I certify that Reed Smith reviewed the Application and has approved it.

4. In respect of section B.1 of the Local Guidelines, I certify that:

- a. I have read the Application;
- b. to the best of my knowledge, information, and belief formed after reasonable inquiry, the fees and disbursements sought fall within the Local Guidelines;
- c. the fees and disbursements sought are billed at rates in accordance with those customarily charged by Reed Smith and generally accepted by Reed Smith’s clients; and
- d. in providing a reimbursable service, Reed Smith does not make a profit on that service, whether the service is performed by Reed Smith in-house or through a third party.

5. In respect of section B.2 of the Local Guidelines and as required by the Administrative Order, I certify that the trustee, the chair of each official committee and the debtor have all been provided not later than 20 days after the end of each month with a statement of fees and disbursements accrued during such month, and that the statement contains a list of professionals and paraprofessionals providing services, their respective billing rates, the aggregate hours spent by each professional and paraprofessional, a general description of services rendered, a reasonably detailed breakdown of the disbursements incurred and an explanation of billing practices.

6. In respect of section B.3 of the Local Guidelines and as required by the Administrative Order, I certify that the Office of the United States Trustee, the Debtors, the attorneys for the Official Committee of Unsecured Creditors, are each being provided with a copy of the Application at least ten (10) days before the date set by the court or any applicable rules for filing fee applications.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on: June 2, 2011

By: /s/ Carolyn H. Rosenberg  
Carolyn H. Rosenberg

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

-----X  
In re : Chapter 11  
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : Case No. 08-13555 (JMP)  
Debtors : (Jointly Administered)  
:

-----X  
**ORDER GRANTING SECOND INTERIM APPLICATION OF REED SMITH LLP  
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM DECEMBER 1, 2010 THROUGH FEBRUARY 28, 2011**

Upon consideration of the Second Interim Application of Reed Smith LLP for Allowance of Compensation and Reimbursement of Expenses for the Period from December 1, 2010 through February 28, 2011 (the "Application") for professional services rendered and expenses incurred during the period commencing December 1, 2010 through and including February 28, 2011; and a hearing having been held before the Court to consider the Application; and notice having been given pursuant to Federal Rules of Bankruptcy Procedure 2002(a)(7) and (c)(2); and due consideration having been given to any responses thereto; and sufficient cause having been shown therefore, it is hereby

ORDERED that the Application is granted to the extent set forth in Schedule "A."

This \_\_\_\_ day of \_\_\_\_\_, 2011.

\_\_\_\_\_  
THE HONORABLE JAMES M. PECK  
UNITED STATES BANKRUPTCY JUDGE

## **SCHEDULE A**

**Lehman Brothers Holdings, Inc., et al.**  
**Case No. 08-13555 (JMP)**

<b>APPLICANT</b>	<b>APPLICATION FILING DATE AND DOCKET NUMBER</b>	<b>FEES REQUESTED</b>	<b>FEES AWARDED</b>	<b>EXPENSES REQUESTED</b>	<b>EXPENSES AWARDED</b>
Reed Smith LLP	Second Interim Application  Docket No. TBD	\$237,869.50	\$237,869.50	\$237,869.50	\$237,869.50